

**VICKERY ENVIRONMENTAL, INC.**

3956 State Route 412, Vickery, OH 43464

Phone: 419/547-7791 X Fax: 419/547-6144

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

7000 1670 0002 6379 9382

August 19, 2005

Mr. Bharat Mathur
Regional Administrator
U.S. Environmental Protection Agency Region V
77 W. Jackson Blvd.
Chicago, IL 60609

RECEIVED

AUG 23 2005

AIR ENFORCEMENT BRANCH
U.S. EPA, REGION 5

Re: Vickery Environmental, Inc.
OHD 020 273 819
RCRA Class 1 Permit Modification

US EPA RECORDS CENTER REGION 5



1006397

Dear Mr. Mathur:

In accordance with 40 CFR 270.42(g)(1)(ii), Vickery Environmental, Inc. (VEI) submits a Class 1 permit modification for the waste from nonwastewaters generated from the production of certain dyes, pigments, and FD&C colorants that are newly listed. Included as attachments to this letter is the information required by 40 CFR 270.42(a) and (g). This modification permits the acceptance of the waste code listed below for waste types currently managed at this facility.

<u>Waste Codes</u>	<u>Effective Date of Listing</u>	<u>Federal Register</u>
K181	August 23, 2005	February 24, 2005

This waste will be treated (T01) and stored (S02) in tanks, treated by filtration (T04) and deepwell injected (D79).

This modification is classified as a Class 1 Modification based on the criteria presented in 40 CFR 270.42(g) and on the criteria in Appendix I to 40 CFR 270.42, section G.5.d.

Below is a listing of the Attachments:

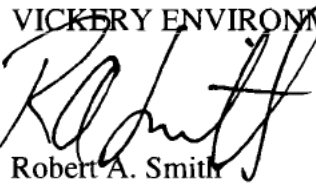
Attachment 1 Summary of Rule Requirements and Facility Response
Attachment 2 Federal RCRA Permit Attachment Additional Hazardous Wastes
Attachment 3 Newly Listed Waste Codes and Associated Constituents

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions, please contact Dan Raezer at 419-547-3335.

Sincerely,

VICKERY ENVIRONMENTAL, INC.



Robert A. Smith
Vice President

RAS/dr

Attachments

cc w/: Ms. Jose Cisneros, USEPA Region V, DW-8J
Ms. Jennifer Dodds, USEPA Region V - (via e-mail at dodds.jennifer@epa.gov)

Attachment 1

Summary of Rule Requirements and Facility Response

Attachment 1 - August 19, 2005
Summary of Rule Requirements and Facility Response

Newly Regulated Wastes 40 CFR 270.42(g)(1)...	Rule Requirement	Facility Response
(i)	Existence as hazardous waste facility	VEI is a permitted hazardous waste treatment storage and disposal facility. On October 24, 1994, the Ohio EPA and the US EPA issued the facility a RCRA Part B and HSWA permit, respectively. The Ohio EPA RCRA Part B permit was renewed on August 17, 2001 and the US EPA HSWA permit was renewed on April 14, 2005.
(ii)	Class 1 Modification	The facility submits this Class 1 modification in accordance with 40 CFR 270.42(a). The rule regulating waste code K181 is effective August 23, 2005.
(iii)	Permittee compliance	The permittee is in compliance with the applicable standards of 40 CFR 265 and 266.
(iv)	Class 2 Modification	A complete Class 2 modification request for the addition of 181 will be submitted on or after the August 23, 2005.
(v)	Land Disposal Units	Non-Applicable

Attachment 1 - August 19, 2005
Summary of Rule Requirements and Facility Response

Class 1 Modification 40 CFR 270.42(a)(1)...	Rule Requirement	Facility Response
(i)	Notification to Director.	This notification meets the requirements of this rule. This change is necessary in order to manage wastes, which are otherwise acceptable with the facility design.
	40 CFR 270.13-Part A	See Attachment 2 for the Federal RCRA Permit Attachment Additional Hazardous Wastes.
	40 CFR 270.14-Part B	See Attachment 2 for the revised language of the Federal RCRA Permit Attachment Additional Hazardous Wastes. See Attachment 3 for the Newly Listed Waste Codes and Associated Constituents. The addition of these codes will not require any additional or different management practices. There will be no addition to or change in the treatment process. Blending of wastes will still occur in tanks. Filtration of the waste stream will occur in the existing, permitted filtration operations. All wastes will pass the currently approved Waste Analysis Plan requirements, thereby demonstrating that they are the same type of waste the facility currently and previously has managed. No new fire protection is required.

Attachment 1 - August 19, 2005
Summary of Rule Requirements and Facility Response

Class 1 Modification 40 CFR 270.42(a)(1)...	Rule Requirement	Facility Response
(i) (cont'd)	40 CFR 270.15-Containers	The facility does not manage hazardous wastes in these types of units under this rule.
	40 CFR 270.16-Tanks	The addition of this code will not require any additional or different management practices. There will be no addition to or change in the treatment process. Blending of wastes will still occur in tanks. Filtration of the waste stream will occur in the existing, permitted filtration operations. All wastes will pass the currently approved Waste Analysis Plan requirements, thereby demonstrating that they are the same type of waste the facility currently and previously has managed. No new fire protection is required.
	40 CFR 270.17 to 40 CFR 270.21; 40 CFR 270.62 and 40 CFR 270.63 Surface Impoundments, waste piles, incinerators, land treatment.	The facility does not manage hazardous wastes in these types of units.
(ii)	Notification to those on mailing list.	This notification will be made within 90 days after August 23, 2005.

Attachment 2

Federal RCRA Permit Attachment Additional Hazardous Wastes, Modified 8/19/05

- K175 Wastewater treatment sludges from the production of vinyl chloride monomer using mercuric chloride catalyst in an acetylene-based process.
- K176 Baghouse filters from the production of antimony oxide, including filters from the production of intermediates (e.g., antimony metal or crude antimony oxide).
- K177 Slag from the production of antimony oxide that is speculatively accumulated or disposed, including slag from the production of intermediates (e.g., antimony metal or crude antimony oxide).
- K181 Nonwastewaters generated from the production of certain dyes, pigments, and FD&C colorants.

Attachment 3

Newly Listed Waste Code and Associated Constituents

WASTE CODE	CHEMICAL	CAS#	
K181	o-Anisidine (2-methoxyaniline)	90-04-0	
	p-Cresidine	120-71-8	
	2,4-Dimethylaniline (2,4-xylydine)	95-68-1	
	1,2-Phenylenediamine	95-54-5	
	1,3-Phenylenediamine	108-45-2	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 08 2002

CERTIFIED MAIL: 7001 0320 0006 0202 7121
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF
DW-8J

Stephen C. Lonneman
General Manager
Vickery Environmental, Inc.
3956 State Route 412
Vickery, Ohio 43464

**RE: Class 1 Permit Modifications Request,
Vickery Environmental, Inc.
OHD 020 273 819**

Dear Mr. Lonneman:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the Vickery Environmental, Inc. (VEI) permit modification, dated January 10, 2002. VEI requested early termination of Section III, Corrective Action Requirements of its Federal RCRA permit, originally issued on October 24, 1994. The Corrective Action Requirements, VEI requested early termination for, are redundant with VEI's existing State RCRA permit. The modification was submitted in accordance with Title 40 Code of Federal Regulations (40 C.F.R.) §270.42(a).

Based on its review, the U.S. EPA approves VEI's Class 1 Federal RCRA permit modification request. The U.S. EPA has early terminated permit conditions III.A., III.B, III.C, III.D, III.E, III.F, and III.G. on pages 9 through 15 of the Federal RCRA permit.

VEI shall replace its Federal RCRA permit, starting with the "PERMIT INDEX" page through page 12 of 12, with the enclosed replacement pages. All "ATTACHMENTS" to the Federal RCRA permit are unchanged and remain a portion of the revised Federal RCRA permit, even though not provided with the enclosed replacement pages.

If you have any questions, please contact William Enriquez at (312) 886-1484.

Sincerely,

Karl Bremer, Chief
Waste Management Branch

Enclosure

cc: Ed Lim, OEPA/CO
Dave Schilt, OEPA Onsite Inspector, NWDO

bcc: File
Section Reading
Author
Branch Reading

DW-8J:ENRIQUEZ:gpc:6-1484:03/06/02:File - F:\USER\Wenrique\Documents\Permitting
Letters\VEI Class1Mod 30702.wpd

WASTE MANAGEMENT BRANCH

SECRETARY	SECRETARY	SECRETARY
		<i>[Signature]</i> 3/7/02
TYPIST/ AUTHOR	TSPS SECTION CHIEF	WMB BRANCH CHIEF
<i>Wm E3</i> 3/7/02	<i>SPC</i> 3-7-02	<i>KSD</i> 3/8/02

PERMIT INDEX

PERMIT CONDITIONS:

PAGE

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ATTACHMENTS:

I.	List of Solid Waste Management Units
II.	RCRA Corrective Action Scope of Work
III.	Waste Analysis Plan

PERMIT CONDITIONS

(Note: The regulatory citations in parentheses are incorporated by reference.)

I. STANDARD CONDITIONS

A. EFFECT OF PERMIT (40 CFR 270.4 and 270.30(g))

The Permittee is allowed to manage hazardous waste in accordance with the conditions of the RCRA permit. Any management of hazardous waste not authorized in the RCRA permit is prohibited.

Compliance with the RCRA permit during its term constitutes compliance, for the purposes of enforcement, with Subtitle C of RCRA, except for those requirements not included in the permit which become effective by statute, or which are promulgated under 40 CFR Part 268, restricting the placement of hazardous waste in or on the land. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under Sections 3008(a), 3008(h), 3013, or 7003 of RCRA; Sections 104, 106(a), or 107 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended (42 U.S.C. §9601 *et seq.*, commonly known as CERCLA); or any other law providing for protection of public health or the environment.

B. PERMIT ACTIONS (40 CFR 270.30(f))

This permit may be modified, revoked and reissued, or terminated for cause as specified in 40 CFR 270.41, 270.42, and 270.43. This permit may also be reviewed and modified by the U.S. EPA, consistent with 40 CFR 270.41, to include any terms and conditions determined necessary to protect human health and the environment pursuant to Section 3005(c)(3) of RCRA. The filing of a request for a permit modification, revocation and reissuance, or termination, or the notification of planned changes, or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition. The Permittee shall not perform any construction associated with a Class 3 permit modification request until such modification request is granted and the modification becomes effective.

C. SEVERABILITY (40 CFR 124.16)

The provisions of this permit are severable, and if any provision of this permit, or if the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

D. DUTIES AND REQUIREMENTS

1. Duty to Comply. (40 CFR 270.30(a))

The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance is authorized by an emergency permit (See 40 CFR 270.61). Any permit noncompliance, other than noncompliance authorized by an emergency permit, constitutes a violation of RCRA and HSWA and is grounds for enforcement action, permit termination, revocation and reissuance, modification, denial of a permit renewal application, or other appropriate action.

2. Duty to Reapply. (40 CFR 270.30(b) and 270.10(h))

The Permittee shall submit a complete application for a new permit at least 180 days before this permit expires unless: a) the Permittee no longer wishes to operate a hazardous waste management facility; b) the Permittee is no longer required to have a RCRA permit; or c) permission for a later date has been granted by the Regional Administrator. The Regional Administrator shall not grant permission for applications to be submitted later than the expiration date of the existing permit.

3. Permit Expiration. (40 CFR 270.13, 270.14, 270.50, and 270.51)

This permit and all conditions herein shall be effective for a fixed term not to exceed 10 years, and will remain in effect beyond the permit's expiration date only if the Permittee has submitted a timely, complete application (per 40 CFR 270.10 and applicable sections of 270.14 through 270.29): a) to both the U.S. EPA and the State; and b) through no fault of the Permittee, the Regional Administrator and the State have not issued a new permit, as set forth in 40 CFR 270.51.

4. Need to Halt or Reduce Activity Not a Defense. (40 CFR 270.30(c))

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

5. Duty to Mitigate. (40 CFR 270.30(d))

In the event of releases or noncompliance with the permit, the Permittee shall take all reasonable steps to minimize releases to the environment and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health and the environment.

6. Proper Operation and Maintenance. (40 CFR 270.30(e))

The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality control/quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit.

7. Duty to Provide Information. (40 CFR 270.30(h) and 264.74)

The Permittee shall furnish to the Regional Administrator, within the time designated by the Regional Administrator, any relevant information which the Regional Administrator may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Regional Administrator, upon request, copies of records required to be kept by this permit.

8. Inspection and Entry. (40 CFR 270.30(i))

The Permittee shall allow the Regional Administrator, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:

- a. Enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
- d. Sample or monitor, at reasonable times, for the purposes of assuring permit compliance, or as otherwise authorized by RCRA, any substances or parameters at any location.

9. Monitoring and Recordkeeping. (40 CFR 270.30(j), 270.31, 264.73, and 264.74)

The Permittee shall retain all reports, records, or other documents, required by this permit, and records of all data used to complete the application for this permit, for a period of at least 3 years from the date of the reports, records or other documents. Corrective Action records must be maintained at least 3 years after all Corrective Action activities have been completed.

These periods may be extended by request of the Regional Administrator at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility.

10. Reporting Planned Changes. (40 CFR 270.30(l)(1))

The Permittee shall give notice to the Regional Administrator of any planned physical alterations or additions to the permitted facility, as soon as possible, and at least 30 days before construction of such alteration or addition is commenced.

11. Anticipated Noncompliance. (40 CFR 270.30(l)(2))

The Permittee shall give advance notice to the Regional Administrator of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements. Such notice does not constitute a waiver of the Permittee's duty to comply with permit requirements.

12. Transfer of Permits. (40 CFR 270.30(l)(3), 270.40(a), and 264.12(c))

This permit may be transferred by the Permittee to a new owner or operator only after providing notice to the Regional Administrator and only if the permit is modified, or revoked and reissued, pursuant to 40 CFR 270.40(b), 270.41(b)(2), or 270.42(a). Before transferring ownership or operation of the facility during its operating life, the Permittee shall notify the new owner or operator in writing of the requirements of 40 CFR Parts 264, 268, and 270 (including all applicable corrective action requirements), and shall provide a copy of the RCRA permit to the new owner or operator.

13. Compliance Schedules. (40 CFR 270.30(l)(5) and 270.33)

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted to the Regional Administrator no later than 14 days following each scheduled date.

14. Twenty-four Hour Reporting. (40 CFR 270.30(l)(6) and 270.33)

The Permittee shall report to the Regional Administrator any noncompliance with this permit which may endanger human health or the environment. Any such information shall be reported orally within 24 hours from the time the Permittee becomes aware of the circumstances. This report shall include the following:

- a. Information concerning the release of any hazardous waste which may endanger public drinking water supplies; and

b. Information concerning the release or discharge of any hazardous waste, or of a fire or explosion at the facility, which could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:

- (1) Name, address, and telephone number of the owner or operator;
- (2) Name, address, and telephone number of the facility;
- (3) Date, time, and type of incident;
- (4) Name and quantity of material(s) involved;
- (5) The extent of injuries, if any;
- (6) An assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and
- (7) Estimated quantity and disposition of recovered material that resulted from the incident.

A written submission shall also be provided within 5 days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period(s) of noncompliance (including exact dates and times); steps taken to minimize impact on the environment; whether the noncompliance has been corrected, and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate and prevent recurrence of the noncompliance. The Permittee need not comply with the 5-day written notice requirement if the Regional Administrator waives the requirement. Upon waiver of the 5-day requirement, the Permittee shall submit a written report within 15 days of the time the Permittee becomes aware of the circumstances.

15. Other Noncompliance. (40 CFR 270.30(l)(10))

The Permittee shall report all other instances of noncompliance not otherwise required to be reported above within 15 days of when the Permittee becomes aware of the noncompliance. The reports shall contain the information listed in Condition I.D.14.

16. Other Information. (40 CFR 270.30(l)(11))

Whenever the Permittee becomes aware that it failed to submit any relevant facts, or submitted incorrect information to the Regional Administrator in the permit application or in any reports, records, or other documentation provided to the Regional Administrator, the Permittee shall promptly submit such facts or information.

17. Submittal of Reports or Other Information. (40 CFR 270.30(l)(7), (8), and (9), and 270.31)

All reports or other information required to be submitted pursuant to this permit shall be sent to:

Waste Management Branch, DRP-8J
Waste, Pesticides and Toxics Division
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

Attention: **Technical Support and Permitting Section**

18. All other requirements contained in RCRA, as amended, and in 40 CFR 270.30 not set forth herein are hereby fully incorporated in this permit.

E. SIGNATORY REQUIREMENT (40 CFR 270.30(k))

All reports or other information submitted to or requested by the Regional Administrator, his designee, or authorized representative, shall be signed and certified as required by 40 CFR 270.11.

F. CONFIDENTIAL INFORMATION

In accordance with 40 CFR 270.12 and 40 CFR Part 2, Subpart B, any information submitted to the U.S. EPA pursuant to this permit may be claimed as confidential by the submitter. Any such claim must be asserted at the time of submission in the manner prescribed on the application form or instructions, or, in the case of other submissions, by marking the words "Confidential Business Information" on each page containing such information.

If no claim is made at time of submission, the U.S. EPA may make the information available to the public without further notice. If a claim is asserted, the information will be treated in accordance with the procedures in 40 CFR Part 2.

G. DOCUMENTS TO BE MAINTAINED AT THE FACILITY

The Permittee shall maintain at the facility, until closure is completed and certified by an independent registered professional engineer, all items required by 40 CFR 264.73, including the following documents and all amendments, revisions, and modifications to these documents:

1. Waste Analysis Plan, as required by 40 CFR 264.13 and this permit;
2. Operating Record, as required by 40 CFR 264.73 and this permit;
3. Notifications from generators accompanying each incoming shipment of wastes subject to 40 CFR Part 268, Subtitle C, that specify treatment standards as required by 40 CFR 264.73, 268.7, and this permit;

4. Corrective Action reports and records as required by Conditions III.F. and VI. of this permit. These reports and records must be maintained for at least 3 years after all Corrective Action Activities have been completed.
5. Records regarding closed-vent systems and control devices and/or equipment leaks as required by 40 CFR 264.1035, 264.1064, and 264.73, and Condition V.C. of this permit.

II. LAND DISPOSAL REQUIREMENTS

A. GENERAL CONDITIONS

1. The Permittee shall comply with all the applicable self-implementing requirements of 40 CFR Part 268 and all applicable land disposal requirements which become effective by statute (Section 3004 of RCRA).
2. A mixture of any restricted waste with nonrestricted waste(s) is a restricted waste under 40 CFR Part 268.
3. The Permittee shall not in any way dilute a restricted waste or the residual from treatment of a restricted waste as a substitute for adequate treatment to achieve compliance with 40 CFR Part 268, Subpart D, to circumvent the effective date of a prohibition in 40 CFR Part 268, Subpart C, to otherwise avoid a prohibition in 40 CFR Part 268, Subpart C, or to circumvent a land disposal prohibition imposed by Section 3004 of RCRA.
4. The Permittee shall prepare and maintain a current list of the hazardous waste codes handled by the facility that are identified in 40 CFR 268, Subparts B and C. The list shall include all waste codes handled by the facility, and any associated treatment standards, and shall be updated through the inclusion of new treatment standards, as promulgated or amended. This list shall be provided to the U.S. EPA representatives, or their designees, upon request.

B. TESTING AND RELATED REQUIREMENTS

1. The Permittee must test, in accordance with 40 CFR 268.7(a), any waste generated at the facility, or use knowledge of the waste, to determine if the waste is restricted from land disposal.
2. For restricted wastes with treatment standards expressed as concentrations in the waste extract, as specified in 40 CFR 268.41, the Permittee shall test the wastes or waste treatment residues, or extracts of such residues developed using the test methods described in Appendix II of 40 CFR Part 261 (Toxicity Characteristic Leaching Procedure, or TCLP) to assure that the wastes or waste treatment residues or extracts meet the applicable treatment standards of 40 CFR Part 268, Subpart D. Such testing shall be performed as required by 40 CFR 264.13.

3. A restricted waste for which a treatment technology is specified under 40 CFR 268.42(a) may be land disposed after it is treated using that specified technology or an equivalent treatment method approved by the Administrator under the procedures set forth in 40 CFR 268.42(b).
4. For restricted wastes with treatment standards expressed as concentrations in the waste, as specified in 40 CFR 268.43, the Permittee shall test the wastes or waste treatment residues (not extracts of such residues) to assure that the waste or waste treatment residues meet the applicable treatment standards of 40 CFR Part 268, Subpart D. Such testing shall be performed as required by 40 CFR 264.13.
5. The Permittee shall comply with all the applicable notification, certification, and recordkeeping requirements described in 40 CFR 268.7(a) and (b).

C. STORAGE PROHIBITIONS

1. The Permittee shall comply with all the applicable prohibitions on storage of restricted wastes specified in 40 CFR Part 268, Subpart E.
2. Except as otherwise provided in 40 CFR 268.50, the Permittee may store restricted wastes in tanks and containers solely for the purpose of the accumulation of such quantities of hazardous wastes as necessary to facilitate proper recovery, treatment, or disposal provided that:
 - a. Each container is clearly marked to identify its contents and the date each period of accumulation begins; and
 - b. Each tank is clearly marked with a description of its contents, the quantity of each hazardous waste received, and the date each period of accumulation begins, or such information for each tank is recorded and maintained in the operating record at that facility.
3. The Permittee may store restricted wastes for up to 1 year unless the U.S. EPA or its authorized agent can demonstrate that such storage was not solely for the purpose of accumulating such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment or disposal.
4. The Permittee may store restricted wastes beyond 1 year; however, the Permittee bears the burden of proving that such storage was solely for the purpose of accumulating such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment or disposal.
5. The Permittee shall not store any liquid hazardous waste containing polychlorinated biphenyls (PCBs) at concentrations greater than or equal to 50 ppm unless the waste is stored in a storage facility that meets the requirements of 40 CFR 761.65(b). This waste must be

removed from storage and treated or disposed as required by 40 CFR Part 268 within 1 year of the date when such wastes are first put into storage. Condition II.C.4. above, that allows storage for over 1 year with specified demonstration, does not apply to PCB wastes prohibited under 40 CFR 268.32.

III. CORRECTIVE ACTION REQUIREMENTS

A. CORRECTIVE ACTION AT THE FACILITY

Early Terminated

B. CORRECTIVE ACTION BEYOND THE FACILITY BOUNDARY

Early Terminated

C. IDENTIFICATION OF SWMUs

Early Terminated

D. NEWLY IDENTIFIED SWMUs OR RELEASES

Early Terminated

E. CORRECTIVE ACTION FOR NEWLY IDENTIFIED SWMUs AND RELEASES

Early Terminated

F. CORRECTIVE ACTION ACTIVITIES

Early Terminated

G. DISPUTE RESOLUTION

Early Terminated

IV. TOXICITY CHARACTERISTIC

A. WASTE IDENTIFICATION

Early Terminated

B. WASTE CHARACTERIZATION

Early Terminated

C. OTHER WASTE IDENTIFICATION

The Permittee may store, treat and dispose of the following wastes in tanks, filtration unit and injection wells at the facility subject to the terms of the RCRA permit.

Description of Hazardous Waste	EPA Hazardous Waste Number	Maximum Volume	Description of Units
Liquid Waste	See list below	1,102,600 gallons	Tank Storage (S02)
Liquid Waste	See list below	650,000 gallons/day	Treatment in Tanks (T01)
Liquid Waste	See list below	650,000 gallons/day	Filtration (T04)
Liquid Waste	See list below	2.4x10 ⁹	Injection Well Disposal (D79)

EPA Hazardous Waste Numbers: K140, K169, K170, K171, K172, U408

D. CONDITIONS REGARDING UNITS

1. All units described in Condition IV.A. above shall be operated in accordance with the State permit conditions and the State Underground Injection Control Permit conditions pertaining to those units.
2. The Permittee shall follow the waste analysis procedures required in 40 CFR Part 264, and as described in the Waste Analysis plan found in Attachment III.

V. AIR EMISSION STANDARDS

A. PROCESS VENTS

The Permittee shall comply with all applicable requirements of 40 CFR Part 264, Subpart AA, regarding air emission standards for process vents.

B. EQUIPMENT LEAKS

The Permittee shall comply with all applicable requirements of 40 CFR Part 264, Subpart BB, regarding air emission standards for equipment leaks.

C. RECORDKEEPING

The Permittee shall comply with all applicable recordkeeping and reporting requirements described in 40 CFR 264.1035, 264.1036, 264.1064, and 264.1065.

D. NOTIFICATION OF REGULATED ACTIVITY

The Permittee shall notify the Regional Administrator of any waste management units which become subject to the requirements of 40 CFR Part 264, Subparts AA and BB, within 30 days of startup of the regulated activity.

E. DUTY TO COMPLY WITH FUTURE REQUIREMENTS

The Permittee shall comply with all self-implementing provisions of any future air regulations promulgated under the provisions of Section 3004(n) of RCRA, as amended by HSWA.

SCHEDULE OF COMPLIANCE

FACILITY SUBMISSION SUMMARY

Below is a summary of the planned reporting and implementation requirements pursuant to this Schedule to Compliance.

Facility Submission RequirementsDue Date

Notification of newly-identified SWMUs.

Thirty (30) calendar days after discovery.

Notification of newly-discovered releases.

Thirty (30) calendar days after discovery.

Notification of waste management units subject to the requirements of 40 CFR Part 264, Subparts AA and BB.

Thirty (30) days after startup of the activity.

Progress reports on all activities.

Monthly, no later than thirty (30) calendar days after Permittee is required to begin implementation.

Report on current conditions

Within sixty (60) calendar days of the effective date of the permit.

Facility Submission RequirementsDue Date

Schedule a meeting with U.S. EPA

Within 30 calendar days after the submission of the report on current conditions, CWM will schedule a meeting with the U.S. EPA. The meeting will be held to discuss the current conditions report, specific objectives of the RFI, and content requirements for the RFI's Quality Assurance Project Plan.

RFI Workplan

Within one hundred and eighty (180) calendar days after the effective date of the permit.

RFI Workplan Implementation

Within thirty (30) calendar days of written approval of the RFI Workplan.

RFI Report and Summary Report

Within sixty (60) calendar days after completion of RFI.

CMS Workplan

Within forty-five (45) calendar days after notification of requirement to perform CMS.

CMS Workplan Implementation

Within thirty (30) calendar days of written approval of the CMS Workplan.

CMS Final Report

Within sixty (60) calendar days after completion of CMS.

Demonstration of Financial Assurance

Within one hundred twenty (120) calendar days after permit modification for remedy.



VICKERY ENVIRONMENTAL, INC.

3956 State Route 412, Vickery, OH 43464

Phone: 419/547-7791 • Fax: 419/547-6144

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

7000 0600 0028 4273 2715

January 10, 2002

Mr. Thomas Skinner
Regional Administrator
U.S. Environmental Protection Agency Region V
77 W. Jackson Blvd.
Chicago, IL 60609

Re: Vickery Environmental, Inc.
OHD 020 273 819
RCRA Class 1 Permit Modification

Dear Mr. Ullrich:

In accordance with 40 CFR 270.42, Vickery Environmental, Inc. (VEI) submits a Class 1 permit modification requesting early termination of its Federal Corrective Action Requirements. This modification is being completed per the request of Mr. Tom Matheson, USEPA, Region 5. This request will eliminate items which are redundant with our Ohio EPA permit. Included as an attachment to this letter is the information required by 40 CFR 270.42(a).

This modification is classified as a Class 1 Modification based on the criteria presented in Appendix I to 40 CFR 270.42, section A. 8.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that




Mr. David Ullrich, USEPA
January 10, 2002
Page 2

there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions, please contact Dan Raezer at 419-547-3335.

Sincerely,

VICKERY ENVIRONMENTAL, INC.


Stephen C. Lonneman
General Manager

SCL/dr

Attachments

cc w/: Mr. Tom Matheson, USEPA, Region 5



Attachment 1

Summary of Rule Requirements and Facility Response

Class1Modification 40 CFR 270.42(a)(1)...	Rule Requirement	Facility Response
(i)	Notification to Director.	This notification meets the requirements of this rule. This change is necessary in order to manage wastes which are otherwise acceptable with the facility design.
	40 CFR 270.13-Part A	There is no change to the Part A Application
	40 CFR 270.14-Part B	See Attachment 2 for the revised language of page 9 of the facility's Federal Permit.

Class 1 Modification 40 CFR 270.42(a)(1)...	Rule Requirement	Facility Response
(i) (cont'd)	40 CFR 270.15-Containers	The facility does not manage hazardous wastes in these types of units under this rule.
	40 CFR 270.16-Tanks	There will be no addition to or change in the treatment process. Blending of wastes will still occur in tanks. Filtration of the waste stream will occur in the existing, permitted filtration operations. All wastes will pass the currently approved Waste Analysis Plan requirements, thereby demonstrating that they are the same type of waste the facility currently and previously has managed. No new fire protection is required.
	40 CFR 270.17 to 40 CFR 270.21; 40 CFR 270.62 and 40 CFR 270.63 Surface Impoundments, waste piles, incinerators, land treatment.	The facility does not manage hazardous wastes in these types of units.
(ii)	Notification to those on mailing list.	This notification will be made within 90 days after May 20, 200

Attachment 2

Revised Language of Section III of Federal Permit

Attachment 2 - February 11, 2002
Revised Language of Section III - Page 9 of 18 of Permit

5. The Permittee shall not store any liquid hazardous waste containing polychlorinated biphenyls (PCBs) at concentrations greater than or equal to 50 ppm unless the waste is stored in a storage facility that meets the requirements of 40 CFR 761.65(b). This waste must be removed from storage and treated or disposed as required by 40 CFR part 268 within 1 year of the date when such wastes are first put into storage. Conditions II.C.4. above, that allows storage for over 1 year with specified demonstration, does not apply to PCB wastes prohibited under 40 CFR 268.32.

III. CORRECTIVE ACTION REQUIREMENTS

Early Terminated

IV TOXICITY CHARACTERISTICS

A. WASTE IDENTIFICATION

Early Terminated

B. WASTE CHARACTERIZATION

Early Terminated

C. OTHER WASTE IDENTIFICATION

The Permittee may store, treat and dispose of the following wastes in tanks, filtration unit and injection wells at the facility subject to the terms of the RCRA permit.

Description of Hazardous Waste	EPA Hazardous Waste Number	Maximum Volume	Description of Unit(s)
Liquid Waste	See list below	1,102,600 gallons	Tank Storage (S02)
Liquid Waste	See list below	650,000 gallons/day	Treatment in Tanks (T01)
Liquid Waste	See list below	650,000 gallons/day	Filtration (T04)
Liquid Waste	See list below	2.4x10 ⁹ gallons	Injection Well Disposal (D79)

EPA Hazardous Waste Numbers: K140, K169, K170, K171, K172, K174, K175, **K176, K177, K178**, U408.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUN 18 2001

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL:7099 3400 0000 9599 0224
RETURN RECEIPT REQUESTED

DW-8J

Stephen C. Lonneman
Vickery Environmental, Inc.
3956 State Route 412
Vickery, OH 43464

RE: Class 1 Permit Modification Request
Vickery Environmental, Inc.
OHD 020 273 819

Dear Mr. Lonneman:

On May 3, 2001, the United States Environmental Protection Agency (U.S. EPA) received your Class 1 permit modification request to include the newly listed wastes (K-174 and K-175) which became effective on May 7, 2001. These newly listed wastes were promulgated by the U.S. EPA under the Hazardous and Solid Waste Amendments of 1984 (65 FR 67118, November 8, 2000). Vickery Environmental, Inc. submitted a Class 1 permit modification to continue to handle these newly listed wastes at your hazardous waste management facility.

The U.S. EPA acknowledges the receipt of your Class 1 permit modification request in accordance with 40 CFR § 270.42(g)(ii). Please submit a Class 2 modification request to the U.S. EPA on or before November 6, 2001, in accordance with 40 CFR § 270.42(g)(iv) to continue handling these wastes.

If you have any questions on this matter, please contact Mr. Greg Czajkowski at (312) 886-6838.

Sincerely,

Paul Little, Acting Chief
Waste Management Branch

cc: Ed Lim, OEPA



Vickery Environmental, Inc.
A Waste Management Company
3956 State Route 412
Vickery, Ohio 43464
419-547-7791
Fax: 419-547-6144

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7099 3400 0008 3893 8292

April 21, 2000

Mr. Frances Lyons
Regional Administrator
U.S. Environmental Protection Agency Region V
77 W. Jackson Blvd.
Chicago, IL 60609

RECEIVED
MAY 01 2000

MINOHMI PERMIT SECTION - WMB
Waste, Pesticides & Toxics Division
U.S. EPA - REGION 5

Re: Waste Management of Ohio, Inc. - Vickery, Ohio
OHD 020 273 819
RCRA Class 1 Permit Modification

Dear Mr. Lyons:

Waste Management of Ohio, Inc. Vickery facility, (WMO), (now known as Vickery Environmental, Inc. (VEI)), received US EPA's correspondence dated March 21, 2000 which approved the Class 1* Permit Modification submitted by WMO on January 3, 2000. VEI provides the following clarification on this ownership change. WMI Medical Services, Inc. and Vickery Environmental, Inc. were not two separate corporations. WMI Medical Services, Inc. was the original name and this entity then changed it's name to Vickery Environmental, Inc. so that when the transfer of assets occurred, this step would not be necessary. This name change of WMI Medical Services, Inc. to Vickery Environmental, Inc. occurred on December 27, 1999. Hence, there was only one transfer of ownership and operational control of the facility, which became effective April 21, 2000.

In review of the documentation submitted, VEI has determined that the Part A Application should be updated. VEI submits this Class 1 modification to update the facility's Part A Application. Section VIII.A., "Name of Facility's Legal Owner," and

Vickery Environmental, Inc.

Mr. Frances Lyons
April 21, 2000
Page 2

Section XVIII., "Certifications," have been updated to reflect that the name of the legal owner is be Vickery Environmental, Inc.

This modification meets the criteria of A.1. of Appendix I to 40 CFR 270.42, Administrative and Information Changes. Included as Attachment 1 is a revised Part A Application signed by a responsible corporate officer confirming that both the owner and operator are Vickery Environmental, Inc.

The applicable information required by 40 CFR 270.13 through 270.21, 270.62 and 270.63 is included as Attachment 2 to this letter.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,
VICKERY ENVIRONMENTAL, INC.




Stephen C. Lonneman
General Manager

SCL/slc


Attachments

cc w/:


via Mail Code DRP-8J
via e-mail - hejmad.paulrabhu@epa.gov

Vickery Environmental, Inc.

ATTACHMENT 1
REVISED PART A APPLICATION

For EPA Regional Use Only		 United States Environmental Protection Agency Washington, DC 20460 Hazardous Waste Permit Application Part A (Read the Instructions before starting)			
Date Received					
Month	Day			Year	
I. Facility's EPA ID Number (Mark 'X' in the appropriate box)					
<input type="checkbox"/> A. First Part A Submission			<input checked="" type="checkbox"/> B. Part A Amendment #		
C. Facility's EPA ID Number			D. Secondary ID Number (if applicable)		
0	H	D	0	2	0
2	7	3	8	1	9
II. Name of Facility					
V	I	C	K	E	R
Y	E	N	V	I	R
O	N	M	E	N	T
A	L	,	I	N	C
III. Facility Location (Physical address not P.O. Box or Route Number)					
A. Street					
3	9	5	6	S	T
A	T	E	R	O	U
T	E	4	1	2	
Street (Continued)					
City or Town					
V	I	C	K	E	R
Y					
State			Zip Code		
O	H	4	3	4	6
4	—				
County Code (if known)		County Name			
0	7	2	S	A	N
D	U	S	K	Y	
B. Land Type		C. Geographic Location		D. Facility Existence Date	
(Enter code)		LATITUDE (Degrees, minutes, & seconds)		LONGITUDE (Degrees, minutes, & seconds)	
P		4	1	2	2
		1	9	N	0
		8	2	5	8
		4	0	W	
		1	1	1	9
		1	9	8	0
IV. Facility Mailing Address					
Street or P.O. Box					
3	9	5	6	S	T
A	T	E	R	O	U
T	E	4	1	2	
City or Town					
V	I	C	K	E	R
Y					
State			Zip Code		
O	H	4	3	4	6
4	—				
V. Facility Contact (Person to be contacted regarding waste activities at facility)					
Name (Last)			(First)		
L	O	N	N	E	M
A	N				
S	T	E	P	H	E
N					
Job Title			Phone Number (Area Code and Number)		
G	E	N	E	R	A
L	M	A	N	A	G
E	R	4	1	9	—
		5	4	7	—
		7	7	9	1
VI. Facility Contact Address (See Instructions)					
A. Contact Address			B. Street or P.O. Box		
Location Mailing (Other)					
X					
City or Town			State		
			Zip Code		
			—		

EPA ID Number (Enter from page 1)												Secondary ID Number (Enter from page 1)														
0	H	D	0	2	0	2	7	3	8	1	9															
VII. Operator Information (See instructions)																										
Name of Operator																										
V	I	C	K	E	R	Y		E	N	V	I	R	O	N	M	E	N	T	A	L	,		I	N	C	.
Street or P.O. Box																										
3	9	5	6				S	T	A	T	E		R	O	U	T	E		4	1	2					
City or Town												State		ZIP Code												
V	I	C	K	E	R	Y									O	H		4	3	4	6	4	-			
Phone Number (Area Code and Number)												B. Operator Type		C. Change of Operator		Date Changed										
4	1	9	-	5	4	7	-	7	7	9	1		P		Yes	X	No		0	4	2	1	2	0	0	0
VIII. Facility Owner (See instructions)																										
A. Name of Facility's Legal Owner																										
V	I	C	K	E	R	Y		E	N	V	I	R	O	N	M	E	N	T	A	L	,		I	N	C	.
Street or P.O. Box																										
3	9	5	6				S	T	A	T	E		R	O	U	T	E		4	1	2					
City or Town												State		ZIP Code												
V	I	C	K	E	R	Y									O	H		4	3	4	6	4	-			
Phone Number (Area Code and Number)												B. Owner Type		C. Change of Owner		Date Changed										
4	1	9	-	5	4	7	-	7	7	9	1		P		Yes	X	No		0	4	2	1	2	0	0	0
IX. NAICS Codes (in order of significance, start in left box)																										
First												Third														
(Description) Hazardous Waste Mgmt Services												(Description)														
Second												Fourth														
(Description)												(Description)														
X. Other Environmental Permits (See instructions)																										
A. Permit Type (Enter code)				B. Permit Number												C. Description										
N				2	I	N	0	0	0	1	6	*	F	D				NPDES Stormwater								
R				0	H	D	0	2	0	2	7	3	8	1	9			USEPA Hazardous Waste Management								
U				0	3	-	7	2	-	0	0	9						UIC Well #2								
U				0	3	-	7	2	-	0	1	1						UIC Well #4								
U				0	3	-	7	2	-	0	1	2						UIC Well #5								
U				0	3	-	7	2	-	0	1	3						UIC Well #6								
E				0	3	-	7	2	-	0	0	0	1	0	5			Air Permits P001, T007-8, T017-20, T022-25, T036-41								
E				N	A													USEPA TSCA Appr. Ltr. (9/25/95)								

EPA ID Number (Enter from page 1)

Secondary ID Number (Enter from page 1)

O H D O 2 0 2 7 3 8 1 9

XI. Nature of Business (Provide a brief description)

The Vickery facility receives aqueous wastes for treatment and storage in a series of treatment and disposal tanks. These wastes are filtered, blended, and disposed of through deep injection wells. A closure cell which contains the closure material from clean closed surface impoundments is located on the site.

XII. Process Codes and Design Capacities

- A. **PROCESS CODE** - Enter the code from the list of process codes below that best describes each process to be used at the facility. Thirteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in item XIII.
- B. **PROCESS DESIGN CAPACITY** - For each code entered in column A, enter the capacity of the process:
1. **AMOUNT** - Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action), enter the total amount of waste for that process.
 2. **UNIT OF MEASURE** - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.
- C. **PROCESS TOTAL NUMBER OF UNITS** - Enter the total number of units used with the corresponding process code.

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
<u>Disposal:</u>					
D79	Underground Injection	Gallons; Liters; Gallons Per Day; or Liters Per Day	T81	Cement Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; or Million Btu Per Hour
D80	Landfill	Acre-feet; Hectare-meter; Acres; Cubic Meters; Hectares; Cubic Yards	T82	Lime Kiln	
D81	Land Application	Acres or Hectares	T83	Aggregate Kiln	
D82	Ocean Disposal	Gallons Per Day or Liters Per Day	T84	Phosphate Kiln	
D83	Surface Impoundment Disposal	Gallons; Liters; Cubic Meters; or Cubic Yards	T85	Coke Oven	
D99	Other Storage	Any Unit of Measure Listed Below	T86	Blast Furnace	
<u>Storage:</u>					
S01	Container	Gallons; Liters; Cubic Meters; or Cubic Yards	T87	Smelting, Melting, Or Refining Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; or Million Btu Per Hour
S02	Tank Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T88	Titanium Dioxide Chloride Oxidation Reactor	
S03	Waste Pile	Cubic Yards or Cubic Meters	T89	Methane Reforming Furnace	
S04	Surface Impoundment Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T90	Pulping Liquor Recovery Furnace	
S05	Drip Pad	Gallons; Liters; Acres; Cubic Meters; Hectares; or Cubic Yards	T91	Combustion Device Used in The Recovery Of Sulfur Values From Spent Sulfuric Acid	
S06	Containment Building Storage	Cubic Yards or Cubic Meters	T92	Halogen Acid Furnaces	
S99	Other Disposal	Any Unit of Measure Listed Below	T93	Other Industrial Furnaces Listed in 40 CFR §260.10	
<u>Treatment:</u>					
T01	Tank Treatment	Gallons Per Day; Liters Per Day; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; or Metric Tons Per Hour	T94	Containment Building - Treatment	Cubic Yards; Cubic Meters; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million Btu Per Hour
T02	Surface Impoundment Treatment	Gallons Per Day; Liters Per Day; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; or Metric Tons Per Hour	<u>Miscellaneous (Subpart X):</u>		
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million Btu Per Hour	X01	Open Burning/Open Detonation	Any Unit of Measure Listed Below
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Gallons Per Day; Liters Per Hour; or Million Btu Per Hour	X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; Kilograms Per Hour; Gallons Per Hour; Liters Per Hour; or Gallons Per Day
T80	Boiler	Gallons; Liters; Gallons Per Hour; Liters Per Hour; Btu Per Hour; or Million Btu Per Hour	X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; or Million Btu Per Hour
			X04	Geologic Repository	Cubic Yards; Cubic Meters; Acre-feet; Hectare-meter; Gallons; or Liters
			X99	Other Subpart X	Any Unit of Measure Listed Below

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons	G	Short Tons Per Hour	D	Cubic Yards	Y
Gallons Per Hour	E	Metric Tons Per Hour	W	Cubic Meters	C
Gallons Per Day	U	Short Tons Per Day	N	Acres	B
Liters	L	Metric Tons Per Day	S	Acre-feet	A
Liters Per Hour	H	Pounds Per Hour	J	Hectares	O
Liters Per Day	V	Kilograms Per Hour	R	Hectare-meter	F
		Million Btu Per Hour	X	Btu Per Hour	I

EPA ID Number (Enter from page 1)												Secondary ID Number (Enter from page 1)											
0	H	D	0	2	0	2	7	3	8	1	9												

XII. Process Codes and Design Capabilities (Continued)

EXAMPLE FOR COMPLETING ITEM XII (shown in line number X-1 below): A facility has a storage tank, which can hold 533,788 gallons.

Line Number	A. Process Code (From list above)				B. PROCESS DESIGN CAPACITY		C. Process Total Number Of Units	For Official Use Only														
					1. Amount (Specify)	2. Unit Of Measure (Enter code)																
X 1	S	0	2			5 3 3 7 8 8	G	0	0	1												
1	S	0	2			1097050.	G	0	1	9												
2	T	0	4			650000.	U	0	0	3												
3	T	0	1			650000.	U	0	1	9												
4	D	7	9			2400000000.	G	0	0	4												
5	D	8	3			425000.	Y	0	0	1												
6																						
7																						
8																						
9																						
10																						
11																						
12																						
13																						

NOTE: If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in item XIII.

XIII. Other Processes (Follow instructions from item XII for D99, S99, T04 and X99 process codes)

Line Number (Enter #s in seg w/XII)	A. Process Code (From list above)				B. PROCESS DESIGN CAPACITY		C. Process Total Number Of Units	D. Description Of Process			
					1. Amount (Specify)	2. Unit Of Measure (Enter code)					
X 1	T	0	4								In-situ Vittrification
1											
2	T	0	4			650000.	U	0	0	3	Filtration
3											
4											

EPA ID Number (Enter from page 1)												Secondary ID Number (Enter from page 1)											
0	H	D	0	2	0	2	7	3	8	1	9												

XIV. Description of Hazardous Wastes

- A. EPA HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR, Part 261 Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in item XII A. on page 3 to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in item XII A. on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

- Enter the first two as described above.
- Enter "000" in the extreme right box of item XIV-D(1).
- Use additional sheet, enter line number from previous sheet, and enter additional code(s) in item XIV-E.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form (D.(2)).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "Included with above" and make no other entries on that line.
- Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A. EPA HAZARD WASTE NO. (Enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESS									
				(1) PROCESS CODES (Enter)					(2) PROCESS DESCRIPTION (If a code is not entered in D(1))				
X-1	K 0 5 4	900	P	T	0	3	D	8	0				
X-2	D 0 0 2	400	P	T	0	3	D	8	0				
X-3	D 0 0 1	100	P	T	0	3	D	8	0				
X-4	D 0 0 2									Included With Above			

EPA ID Number (Enter from page 1)												Secondary ID Number (Enter from page 1)											
0	H	D	0	2	0	2	7	3	8	1	9												

XIV. Description of Hazardous Wastes (Continued; use additional sheets as necessary)

Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES																		
				(1) PROCESS CODES (Enter code)								(2) PROCESS DESCRIPTION (If a code is not entered in D(1))										
1	*	630,500.	T																			*See attached page of
2																						the Part B Permit.
3																						Individual waste codes
4																						are not regulated
5																						by the estimated annual
6																						quantity, but are limited
7																						to an overall facility
8																						throughput of 630,500 tons.
9																						Basis 126,000,000 gallons
10																						converted to tons on a
11																						specific gravity of 1.2.
12																						
13																						
14																						
15																						
16																						
17																						
18																						
19																						
20																						
21																						
22																						
23																						
24																						
25																						
26																						
27																						
28																						
29																						
30																						
31																						
32																						
33																						

IV. TOXICITY CHARACTERISTIC

A. WASTE IDENTIFICATION

Early Terminated

B. WASTE CHARACTERIZATION

Early Terminated

C. OTHER WASTE IDENTIFICATION

The Permittee may store, treat and dispose of the following wastes in tanks, filtration unit and injection wells at the facility subject to the terms of the RCRA permit.

Description of Hazardous Waste	EPA Hazardous Waste Number	Maximum Volume	Description of Units
Liquid Waste	See list below	1,102,600 gallons	Tank Storage (S02)
Liquid Waste	See list below	650,000 gallons/day	Treatment in Tanks (T01)
Liquid Waste	See list below	650,000 gallons/day	Filtration (T04)
Liquid Waste	See list below	2.4x10 ⁹	Injection Well Disposal (D79)

EPA Hazardous Waste Numbers: K140, K169, K170, K171, K172, U408

D. CONDITIONS REGARDING UNITS

1. All units described in Condition IV.A. above shall be operated in accordance with the State permit conditions and the State Underground Injection Control Permit conditions pertaining to those units.
2. The Permittee shall follow the waste analysis procedures required in 40 CFR Part 264, and as described in the Waste Analysis plan found in Attachment III.

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved, OMB No. 2050-0034 Expires XX/XX/02
GSA No. 0249-EPA-0T

EPA ID Number (Enter from page 1)												Secondary ID Number (Enter from page 1)											
0	1	2	3	4	5	6	7	8	9														

XV. Map

Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

XVI. Facility Drawing

All existing facilities must include a scale drawing of the facility (See instructions for more detail).

XVII. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

XVIII. Certification(s)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Owner Signature

Name and Official Title (Type or print)
Thomas R. Koogler, Vice President, Vickery Environmental, Inc.

Owner Signature

Date Signed
4/14/2000

Date Signed

Name and Official Title (Type or print)

Operator Signature

Date Signed

Name and Official Title (Type or print)

Operator Signature

Date Signed

Name and Official Title (Type or print)

XIX. Comments

Vickery Environmental, Inc. will become the new owner and operator of the Waste Management of Ohio, Inc. Vickery facility. This restructuring will affect no change in the facility's operations or personnel.

Note: Mail completed form to the appropriate EPA Regional or State Office. (Refer to instructions for more information)

ATTACHMENT 2

SUMMARY OF RULE REQUIREMENTS AND FACILITY RESPONSE

Summary of Rule Requirements and Facility Response

Class 1* Modification 40 CFR 270.42(a)(1)...	Rule Requirement	Facility Response	
(i)	Notification to Director	This letter is the notification.	
(i)	Changes being made to Permit Conditions	There are no requested changes to Permit Conditions.	
(i)	Why Modification Needed	This modification is necessary to update the facility's Part A application, clarifying that the current owner and operator of the facility is Vickery Environmental, Inc.	
(i)	Information Required by 40 CFR 270.13-270.21; 270.62; 270.63.	See information provided below.	
	40 CFR 270.13-Part A	See Attachment 1 for the Federal Part A Application.	
(i)	40 CFR 270.14-Part B	This request is to allow the following to continue: treatment (T01) and storage (S02) in tanks, filtration (T04) and injection well disposal (D79). There are no revisions to the Part B Application. This change is purely administrative in nature and will not require any additional or different management practices. There will be no addition to or change in the treatment process. Blending of wastes will still occur in tanks. Filtration of the waste stream will occur in the existing, permitted filtration operations. All wastes will pass the currently approved Waste Analysis Plan requirements. No new fire protection is required.	
(i)	40 CFR 270.15-Containers	The facility does not manage hazardous wastes in these types of units under this rule.	
	40 CFR 270.17 to 40 CFR 270.21; 40 CFR 270.62 and 40 CFR 270.63 Surface Impoundments, waste piles, incinerators, land treatment.	The facility does not manage hazardous wastes in these types of units.	

Summary of Rule Requirements and Facility Response

Class 1* Modification 40 CFR 270.42(a)(1)...	Rule Requirement	Facility Response	
(i)	40 CFR 270.16-Tanks	There are no revisions to the Part B Application. This change is purely administrative in nature and will not require any additional or different management practices. There will be no addition to or change in the treatment process. Blending of wastes will still occur in tanks. Filtration of the waste stream will occur in the existing, permitted filtration operations. All wastes will pass the currently approved Waste Analysis Plan requirements. No new fire protection is required.	
(ii)	Notification to Mailing List	WMO will send notification of the modification to all persons on the facility mailing list, as maintained by the Director and all appropriate State and local government. These notifications will be made within 90 days after April 21, 2000.	



Vickery Environmental, Inc.
A Waste Management Company
3956 State Route 412
Vickery, Ohio 43464
419-547-7791
Fax: 419-547-6144

February 20, 2001


Re: Vickery Environmental, Inc.
OHD 020 273 819
RCRA Class 1 Permit Modifications

Dear Citizen:

Your name is on the "facility mailing list" for Vickery Environmental, Inc. (VEI) facility. As required by OAC 3745-50-51(D)(1)(a)(ii), VEI is informing you of the following Class 1 Modifications for its Ohio Hazardous Waste Management Permit issued October 24, 1994.

1. On December 7, 2000, the facility added waste codes K169, K170, K171 and K172 to its permit. In addition, the follow waste codes which were vacated from the Ohio rules were removed from the facility's permit: K064, K065, K066, K090, K091, K160, U277, U365, U366, U375, U376, U377, U378, U379, U381, U382, U383, U384, U385, U386, U390, U391, U392, U393, U396, U400, U401, U402, U403, and U407.
2. On January 9 and January 17, 2001, VEI modified it's Contingency Plan. The revisions were to update the list of emergency equipment, update the Emergency Coordinator list, clarify the procedures to contact the Emergency Coordinator, add the telephone number of a newly installed emergency line, update the extension number of the Control Room, update the contact information for the Sandusky County Board of Health and clarify that the Shift Supervisor is responsible for assuring all of the sign in boards are accounted for during a site evacuation.
3. On January 12, 2001, the facility completed an installation of 40 feet of 4" PVC piping at Pumphouse #3 to allow direct flow from the filter press to injection Well #2.
4. On January 26, 2001, the facility updated it's Waste Analysis Plan to incorporate revisions allowed by TSCA regulatory changes and to make the PCB analysis text consistent with other site mandatory analysis sections.

Sincerely,
VICKERY ENVIRONMENTAL, INC.


Stephen C. Lonneman
General Manager

RECEIVED
FEB 27 2001

MNOHVI PERMIT SECTION - W
Waste, Pesticides & Toxics Div
U.S. EPA - REGION 5



Vickery Environmental, Inc.
A Waste Management Company
3956 State Route 412
Vickery, Ohio 43464
419-547-7791
Fax: 419-547-6144

RECEIVED
OCT 02 2000
MNOHWI PERMIT SECTION - 10000
Waste, Pesticides & Toxics Division
U.S. EPA - REGION 5

October 27, 2000

Re: Vickery Environmental, Inc.
OHD 020 273 819
RCRA Class 1 Permit Modifications

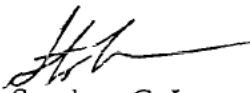
Dear Citizen:

Your name is on the "facility mailing list" for Vickery Environmental, Inc. (VEI) facility. As required by OAC 3745-50-51(D)(1)(a)(ii), VEI is informing you of the following Class 1 Modifications for its Ohio Hazardous Waste Management Permit issued October 24, 1994.

1. On August 10, 2000, the facility implemented a Class 1 modification which included the replacement of approximately 130 feet of 4" fibercast line with Schedule 80 4" CPVC piping.
2. On October 13, 2000, VEI implemented a Class 1 modification which included an update to the Waste Analysis Plan in accordance with PCB rule changes, to update the Emergency Coordinator and the Communications Coordinator list in the Contingency Plan, to update the text of the Contingency Plan to reflect that the owner and operator is VEI, and to update the Organizational Chart in the Training Plan.

Sincerely,

VICKERY ENVIRONMENTAL, INC.


Stephen C. Lonneman
General Manager



Vickery Environmental, Inc.
A Waste Management Company
3956 State Route 412
Vickery, Ohio 43464
419-547-7791
Fax: 419-547-6144

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7000 0600 0028 4272 7292

October 16, 2000

Ms. Harriet Croke, Chief
Ohio Permitting Section (HRP-8J)
Waste Management Division
US EPA, Region 5
77 West Jackson Boulevard
Chicago, IL 60604

Re: Vickery Environmental, Inc. - Vickery Facility
US EPA ID # OHD 020 273 819
Ohio ID # 03-72-0191
Additional Pages for Facility's Permit Renewal Application

Dear Ms. Croke:

Under OAC 3745-50-51, Vickery Environmental, Inc. (VEI) has implemented Class 1 modifications. As requested by Mr. Dave Schilt of the Ohio EPA, VEI is sending to you the following modified pages of it's Part B Permit Renewal Application: 448-449, 626, 628, 653 and 731. Please replace the like numbered pages in your copy of the facility's Part B Permit Renewal Application dated April 15, 1999 with the enclosed pages.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Vickery Environmental, Inc.

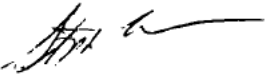
RECEIVED
OCT 24 2000
MNOHWI PERMIT SECTION - WMB
Waste, Pesticides & Toxics Division
U.S. EPA - REGION 5

Ms. Harriet Croke, USEPA
October 16, 2000
Page 2

If you have any questions, please contact Ms. Sandy Clark at 419-547-3335.

Sincerely,

VICKERY ENVIRONMENTAL, INC.



Stephen C. Lonneman
General Manager

SCL/slc

cc w/: Birchard Public Library

cc w/out: David Schilt, OEPA

INCIDENT TELEPHONE CONTACT LIST

EMERGENCY COORDINATORS

Shift Supervisor On Duty (Primary)

John Moneghan
6425 N. St. Rt. 228
Green Springs, OH 44836
Home # (419) 639-2489

Kennard Franks
1709 Emmett Dr.
Fremont, OH 43420
Home # (419) 334-2771

Dennis McClure
3795 S.R. 53 North
Fremont, OH 43420
Home # (419) 334-3528

Robert A. Baumer
1655 E. State Street
Fremont, OH 43420
Home # (419) 332-8713

Greg Burr
1103 W. Cole Road
Fremont, OH 43420
Home # (419) 334-2386

Dan Durbin
1703 Tiffin Road
Fremont, OH 43420
Home # (419) 334-4533

Vince Sidoti
~~524 Sixth St.~~ 3613 Doyle Street
~~Fremont~~ Toledo, OH ~~43420~~ 43608
Home # (419) ~~334-9378~~ 726-5407

Roberta Povolny
18731 SR 105
Elmore, OH 43416
Home # (419) 862-2109

COMMUNICATIONS COORDINATOR (CC)

~~Fred Nicar~~ Steve Lonneman (primary)
(419) ~~547-6431~~ 797-6385

~~Steve Lonneman~~ Sandy Clark (alternate)
(419) ~~797-6385~~ 637-7568

EMERGENCY COORDINATORS

~~Fred Nicar~~
~~3955 St. Rt. 412~~
~~Vickery, OH 43464~~
~~Home # (419) 547-6431~~

Steve Lonneman
4369 E. Stonehenge
Port Clinton, OH 43452
Home # (419) 797-6385

~~Paul Anteau~~
~~413 Erie St.~~
~~Woodville, OH 43469~~
~~Home # (419) 849-2929~~

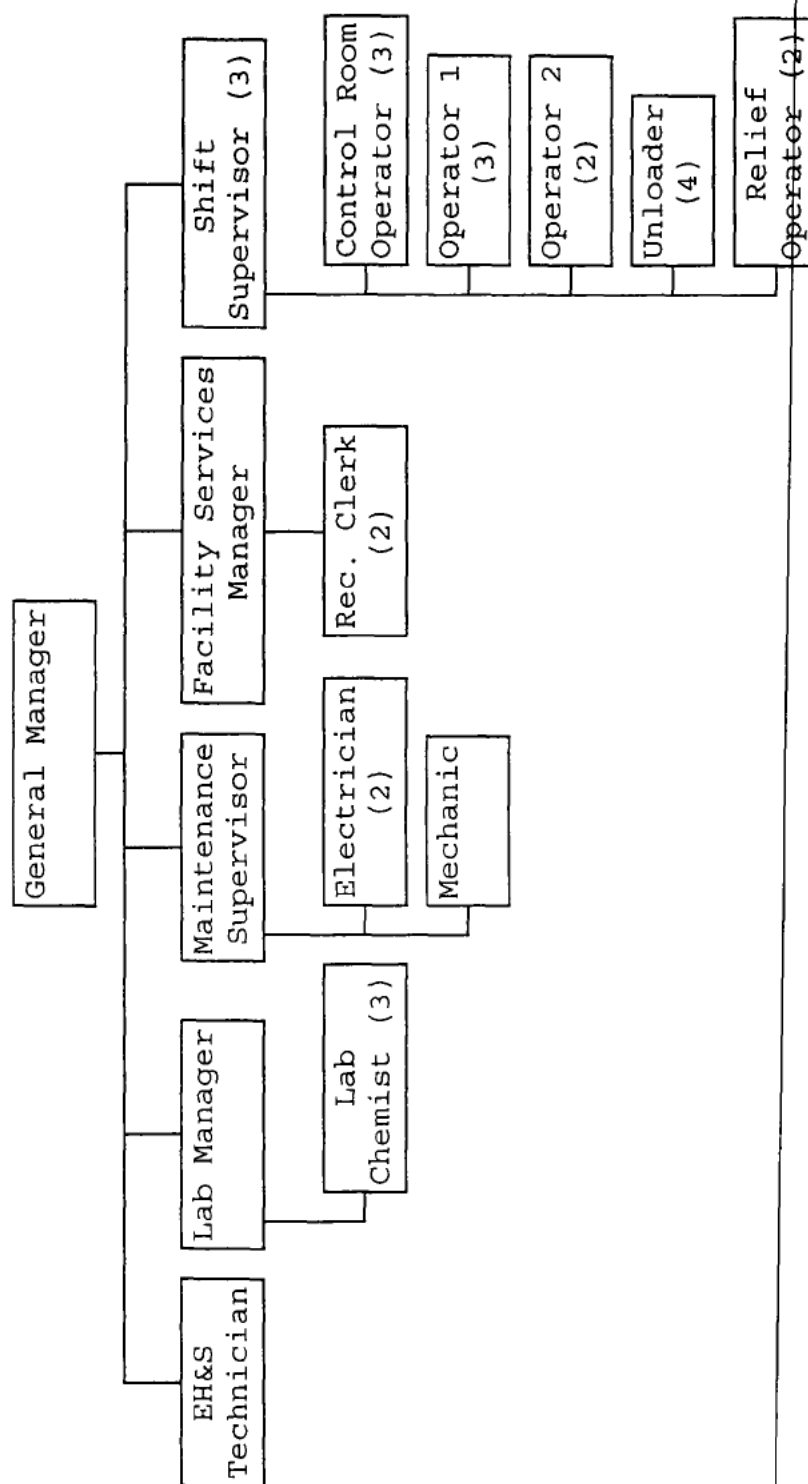
Robin Wuertz
~~309 C.R. 244~~
~~Fremont, OH 43420~~
~~Home # (419) 547-0602~~

~~Phil Randolph~~
~~103 N. Main St.~~
~~Lindsey, OH 43442~~
~~Home # (419) 665-2444~~

Sandy Clark
5696 C.R. 65
Gibsonburg, OH 43431
Home # (419) 637-7568

Brian Franks
703 Pine Street
Fremont, OH 43420
Home # (419) 332-3831

Carolyn Golamb
1230 South CR 198
Fremont, OH 43420
Home # (419) 334-7075

ORGANIZATION CHART

OHD 020 273 819



Vickery Environmental, Inc.
 A Waste Management Company
 3956 State Route 412
 Vickery, Ohio 43464
 419-547-7791
 Fax: 419-547-6144

MNOHWI PERMIT SECTION - WMB
 Waste, Pesticides & Toxics Division
 U.S. EPA - REGION 5

May 2, 2000

Re: Vickery Environmental, Inc.
 OHD 020 273 819
 RCRA Class 1 Permit Modifications

Dear Citizen:

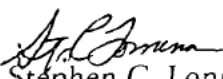
Your name is on the "facility mailing list" for Vickery Environmental, Inc. (VEI) facility (previously known as Waste Management of Ohio, Inc. Vickery facility). As required by 40 CFR 270.42(a)(1)(ii), VEI is informing you of the following Class 1 Modifications for its Federal Hazardous Waste Management Permit issued October 24, 1994.

1. On March 27, 2000, the facility received approval of its modification request to transfer its Permit from Waste Management of Ohio, Inc. to WMI Medical Services, Inc. On April 21, 2000, the facility submitted a modification to change the name of the owner and operator to Vickery Environmental, Inc.

As required by OAC 3745-50-51(D)(1)(a)(ii), VEI is informing you of the following Class 1 Modifications for its Ohio Hazardous Waste Management Permit issued October 24, 1994.

1. On February 4, 2000 and February 15, 2000, the facility implemented a Class 1 modification which included the replacement of approximately 330 feet of 4" fibercast line with Schedule 80 4" CPVC piping.
2. On April 28, 2000, WMO implemented a Class 1 modification which included the correction of a typographical error for the size of the unloading building, an update to the Method Detection Limits for the laboratory which performs the groundwater analysis, an update to a Figure E-15 of the Groundwater Monitoring Plan to include the ground surface elevations of the bedrock wells, an update to an address and telephone number for an Emergency Coordinator and an update to the text of the Contingency Plan to reflect that the first aid supplies will be inventoried and replenished on an as needed basis, and an update to the organizational chart.

Sincerely,
 VICKERY ENVIRONMENTAL, INC.


 Stephen C. Lonneman
 General Manager



Vickery Environmental, Inc.
A Waste Management Company
3956 State Route 412
Vickery, Ohio 43464
419-547-7791
Fax: 419-547-6144

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7099 3400 0008 3893 8216

May 2, 2000

Ms. Harriet Croke, Chief
Ohio Permitting Section (HRP-8J)
Waste Management Division
US EPA, Region 5
77 West Jackson Boulevard
Chicago, IL 60604

RECEIVED
MAY 05 2000
MNOHWI PERMIT SECTION - WMB
Waste, Pesticides & Toxics Division
U.S. EPA - REGION 5

Re: Waste Management of Ohio, Inc. - Vickery Facility
US EPA ID # OHD 020 273 819
Ohio ID # 03-72-0191
Additional Pages for Facility's Permit Renewal Application

Dear Ms. Croke:

Under OAC 3745-50-51, Vickery Environmental, Inc. (VEI) has implemented Class 1 modifications on April 21st and April 28th, 2000. As requested by Mr. Dave Schilt of the Ohio EPA, VEI is sending to you the following modified pages of it's Part B Permit Renewal Application: 5-10, 31, 79, 308-309, 338, 626, 653, 703 and 731. Please replace the like numbered pages in your copy of the facility's Part B Permit Renewal Application dated April 15, 1999 with the enclosed pages.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.


Vickery Environmental, Inc.

Ms. Harriet Croke, USEPA
May 2, 2000
Page 2

If you have any questions, please contact Ms. Sandy Clark at 419-547-3335.

Sincerely,


VICKERY ENVIRONMENTAL, INC.


Stephen C. Lonneman
General Manager

SCL/slc

cc w/: Birchard Public Library

cc w/out: David Schilt, OEPA

For EPA Regional Use Only		 United States Environmental Protection Agency Washington, DC 20460 Hazardous Waste Permit Application Part A <i>(Read the Instructions before starting)</i>				
Date Received						
Month	Day			Year		
I. Facility's EPA ID Number (Mark 'X' in the appropriate box)						
<input type="checkbox"/> A. First Part A Submission			<input checked="" type="checkbox"/> B. Part A Amendment #			
C. Facility's EPA ID Number			D. Secondary ID Number (If applicable)			
O	H	D	0	2	0	
2	7	3	8	1	9	
II. Name of Facility						
V	I	C	K	E	R	
Y	E	N	V	I	R	
O	N	M	E	N	T	
A	L	,	I	N	C	
III. Facility Location (Physical address not P.O. Box or Route Number)						
A. Street						
3	9	5	6	S	T	
A	T	E	R	O	U	
T	E	4	1	2		
Street (Continued)						
City or Town						
V	I	C	K	E	R	
Y						
State		Zip Code				
O	H	4	3	4	6	
4	—					
County Code (If known)		County Name				
0	7	2	S	A	N	
D	U	S	K	Y		
B. Land Type		C. Geographic Location		D. Facility Existence Date		
(Enter code)		LATITUDE (Degrees, minutes, & seconds)		LONGITUDE (Degrees, minutes & seconds)		
P		4	1	2	2	
		1	9	N	0	
		8	2	5	8	
		4	0	W		
		Month	Day	Year		
		1	1	1	9	
		8	0			
IV. Facility Mailing Address						
Street or P.O. Box						
3	9	5	6	S	T	
A	T	E	R	O	U	
T	E	4	1	2		
City or Town						
V	I	C	K	E	R	
Y						
State		Zip Code				
O	H	4	3	4	6	
4	—					
V. Facility Contact (Person to be contacted regarding waste activities at facility)						
Name (Last)			Name (First)			
L	O	N	N	E	M	
A	N		S	T	E	
			P	H	E	
			N			
Job Title			Phone Number (Area Code and Number)			
G	E	N	E	R	A	
L		M	A	N	A	
G	E	R	4	1	9	
			—	5	4	
			7	—	7	
			7	9		
VI. Facility Contact Address (See Instructions)						
A. Contact Address Location: Mailing Other			B. Street or P.O. Box			
X						
City or Town						
State		Zip Code				

EPA ID Number (Enter from page 1)												Secondary ID Number (Enter from page 1)											
0 H D 0 2 0 2 7 3 8 1 9																							
VII. Operator Information (See instructions)																							
Name of Operator																							
V I C K E R Y E N V I R O N M E N T A L , I N C .																							
Street or P.O. Box																							
3 9 5 6 S T A T E R O U T E 4 1 2																							
City or Town												State		ZIP Code									
V I C K E R Y												O H		4 3 4 6 4 -									
Phone Number (Area Code and Number)												B. Operator Type		C. Change of Operator Indicator		Date Changed Month		Day		Year			
4 1 9 - 5 4 7 - 7 7 9 1												P		Yes X No		0 4		2 1		2 0 0 0			
VIII. Facility Owner (See instructions)																							
A. Name of Facility's Legal Owner																							
V I C K E R Y E N V I R O N M E N T A L , I N C .																							
Street or P.O. Box																							
3 9 5 6 S T A T E R O U T E 4 1 2																							
City or Town												State		ZIP Code									
V I C K E R Y												O H		4 3 4 6 4 -									
Phone Number (Area Code and Number)												B. Owner Type		C. Change of Owner Indicator		Date Changed Month		Day		Year			
4 1 9 - 5 4 7 - 7 7 9 1												P		Yes X No		0 4		2 1		2 0 0 0			
IX. NAICS Codes (in order of significance; start in left box)																							
First												Third											
4 9 5 3																							
(Description) Hazardous Waste Mgmt Services												(Description)											
Second												Fourth											
(Description)												(Description)											
X. Other Environmental Permits (See instructions)																							
A. Permit Type (Enter code)				B. Permit Number												C. Description							
N				2 I N 0 0 0 1 6 * F D												NPDES Stormwater							
R				O H D 0 2 0 2 7 3 8 1 9												USEPA Hazardous Waste Management							
U				0 3 - 7 2 - 0 0 9												UIC Well #2							
U				0 3 - 7 2 - 0 1 1												UIC Well #4							
U				0 3 - 7 2 - 0 1 2												UIC Well #5							
U				0 3 - 7 2 - 0 1 3												UIC Well #6							
E				0 3 - 7 2 - 0 0 0 1 0 5												Air Permits P001, T007-8, T017-20, T022-25, T036-41							
E				N A												USEPA TSCA Appr. Ltr. (9/25/95)							

[illegible]

XI. Nature of Business *(Provide a brief description)*

The Vickery facility receives aqueous wastes for treatment and storage in a series of treatment and disposal tanks. These wastes are filtered, blended, and disposed of through deep injection wells. A closure cell which contains the closure material from clean closed surface impoundments is located on the site.

XII. Process Codes and Design Capacities

- A. **PROCESS CODE** - Enter the code from the list of process codes below that best describes each process to be used at the facility. Thirteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in Item XIII.
- B. **PROCESS DESIGN CAPACITY** - For each code entered in column A, enter the capacity of the process.
1. **AMOUNT** - Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.
 2. **UNIT OF MEASURE** - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.
- C. **PROCESS TOTAL NUMBER OF UNITS** - Enter the total number of units used with the corresponding process code.

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
	<u>Disposal:</u>				
D79	Underground Injection	Gallons; Liters; Gallons Per Day; or Liters Per Day	T81	Cement Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
D80	Well Disposal		T82	Lime Kiln	
	Landfill	Acre-feet; Hectare-meter; Acres; Cubic Meters; Hectares; Cubic Yards	T83	Aggregate Kiln	
D81	Land Application	Acres or Hectares	T84	Phosphate Kiln	
D82	Ocean Disposal	Gallons Per Day or Liters Per Day	T85	Coke Oven	
D83	Surface Impoundment	Gallons; Liters; Cubic Meters; or Cubic Yards	T86	Blast Furnace	
D99	Other Storage	Any Unit of Measure Listed Below			
	<u>Storage:</u>				
S01	Container	Gallons; Liters; Cubic Meters; or Cubic Yards	T87	Smelting, Melting, Or Refining Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
S02	Tank Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T88	Titanium Dioxide Chloride Oxidation Reactor	
S03	Waste Pile	Cubic Yards or Cubic Meters	T89	Methane Reforming Furnace	
S04	Surface Impoundment	Gallons; Liters; Cubic Meters; or Cubic Yards	T90	Pulping Liquor Recovery Furnace	
S05	Drip Pad	Gallons; Liters; Acres; Cubic Meters; Hectares; or Cubic Yards	T91	Combustion Device Used In The Recovery Of Sulfur Values From Spent Sulfuric Acid	
S06	Containment Building	Cubic Yards or Cubic Meters	T92	Halogen Acid Furnaces	
S99	Other Disposal	Any Unit of Measure Listed Below	T93	Other Industrial Furnaces Listed in 40 CFR §260.10	
	<u>Treatment:</u>				
T01	Tank Treatment	Gallons Per Day; Liters Per Day; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; or Metric Tons Per Hour	T94	Containment Building - Treatment	Cubic Yards; Cubic Meters; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million Btu Per Hour
T02	Surface Impoundment Treatment	Gallons Per Day; Liters Per Day; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; or Metric Tons Per Hour			
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million Btu Per Hour		<u>Miscellaneous (Subpart X):</u>	
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Gallons Per Day; Liters Per Hour; or Million Btu Per Hour	X01	Open Burning/Open Detonation	Any Unit of Measure Listed Below
T80	Boiler	Gallons; Liters; Gallons Per Hour; Liters Per Hour; Btu Per Hour; or Million Btu Per Hour	X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Kilograms Per Hour; Gallons Per Hour; Liters Per Hour; or Gallons Per Day
			X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; or Million Btu Per Hour
			X04	Geologic Repository	Cubic Yards; Cubic Meters; Acre-feet; Hectare-meter; Gallons; or Liters
			X99	Other Subpart X	Any Unit of Measure Listed Below

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons	G	Short Tons Per Hour	Q	Cubic Yards	Y
Gallons Per Hour	E	Metric Tons Per Hour	W	Cubic Meters	C
Gallons Per Day	U	Short Tons Per Day	N	Acres	B
Liters	L	Metric Tons Per Day	S	Acre-feet	A
Liters Per Hour	H	Pounds Per Hour	J	Hectares	F
Liters Per Day	V	Kilograms Per Hour	R	Hectare-meter	F
		Million Btu Per Hour	X	Btu Per Hour	I

EPA ID Number (Enter from page 1)

Secondary ID Number (Enter from page 1)

O H D 0 2 0 2 7 3 8 1 9

XII. Process Codes and Design Capabilities (Continued)

EXAMPLE FOR COMPLETING ITEM XII (shown in line number X-1 below): A facility has a storage tank, which can hold 533,788 gallons.

Line Number	A. Process Code (From list above)				B. PROCESS DESIGN CAPACITY		C. Process Total Number Of Units	For Official Use Only			
					1. Amount (Specify)	2. Unit Of Measure (Enter code)					
X 1	S	0	2		5 3 3 7 8 8	G	0 0 1				
1	S	0	2		1097050.	G	0 1 9				
2	T	0	4		650000.	U	0 0 3				
3	T	0	1		650000.	U	0 1 9				
4	D	7	9		2400000000.	G	0 0 4				
5	D	8	3		425000.	Y	0 0 1				
6											
7											
8											
9											
1 0											
1 1											
1 2											
1 3											

NOTE: If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in item XIII.

XIII. Other Processes. (Follow instructions from item XII for D99, S99, T04 and X99 process codes)

Line Number (Enter #s in seg w/XII)	A. Process Code (From list above)				B. PROCESS DESIGN CAPACITY		C. Process Total Number Of Units	D. Description Of Process			
					1. Amount (Specify)	2. Unit Of Measure (Enter code)					
X 1	T	0	4					In-situ Vitrification			
1											
2	T	0	4		650000.	U	0 0 3	Filtration			
3											
4											

EPA ID Number (Enter from page 1)	Secondary ID Number (Enter from page 1)
<div style="display: flex; justify-content: space-around;"> OHD020273819 </div>	<div style="display: flex; justify-content: space-around;"> </div>

XIV. Description of Hazardous Wastes

A. EPA HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR, Part 261 Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in item XII A. on page 3 to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in item XII A. on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. Enter the first two as described above.
2. Enter "000" in the extreme right box of item XIV-D(1).
3. Use additional sheet, enter line number from previous sheet, and enter additional code(s) in item XIV-E.

2. **PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form (D.(2)).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A. EPA HAZARD WASTE NO. (Enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESS	
				(1) PROCESS CODES (Enter)	(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
X 1	K 0 5 4	900	P	T 0 3 D 8 0	
X 2	D 0 0 2	400	P	T 0 3 D 8 0	
X 3	D 0 0 1	100	P	T 0 3 D 8 0	
X 4	D 0 0 2				Included With Above

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved, OMB No. 2050-0034 Expires XXXX/02
GSA No. 0248-EPA-OT

EPA ID Number (Enter from page 1)	Secondary ID Number (Enter from page 1)
<div style="display: flex; justify-content: space-between;"> O H D 0 2 0 2 7 3 8 1 9 </div>	

XIV. Description of Hazardous Wastes (Continued; use additional sheets as necessary)

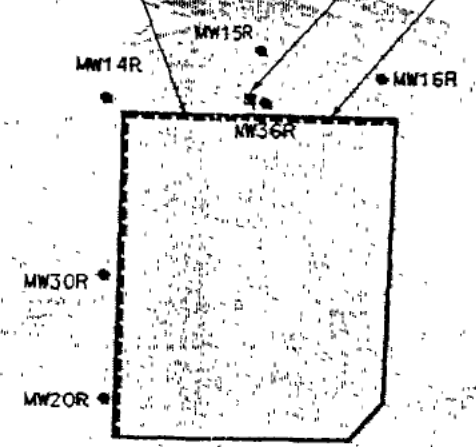
Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES	
				(1) PROCESS CODES (Enter code)	(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
1	*	630,500.	T		*See attached pages of the Part B Permit. Individual waste codes are not regulated by the estimated annual quantity, but are limited to an overall facility throughput of 630,500 tons. Basis 126,000,000 gallons converted to tons on a specific gravity of 1.2.
2					
3					
4					
5					
6					
7					
8					
9					
10					
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29					
30					
31					
32					
33					

EPA ID Number (Enter from page 1)	Secondary ID Number (Enter from page 1)
<div style="display: flex; justify-content: space-around;"> OHDO20273819 </div>	<div style="display: flex; justify-content: space-around;"> </div>
XV. Map	
<i>Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.</i>	
XVI. Facility Drawing	
<i>All existing facilities must include a scale drawing of the facility (See instructions for more detail).</i>	
XVII. Photographs	
<i>All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).</i>	
XVIII. Certification(s)	
<i>I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.</i>	
Owner Signature	Date Signed
Name and Official Title (Type or print)	
Thomas R. Koogler, Vice President, Vickery Environmental, Inc.	
Owner Signature	Date Signed
Name and Official Title (Type or print)	
Operator Signature	Date Signed
Name and Official Title (Type or print)	
Operator Signature	Date Signed
Name and Official Title (Type or print)	
XIX. Comments	
Vickery Environmental, Inc. will become the new owner and operator	
of the Waste Management of Ohio, Inc. Vickery facility. This restructuring	
will affect no change in the facility's operations or personnel.	
Note: Mail completed form to the appropriate EPA Regional or State Office. (Refer to instructions for more information)	





POINT OF COMPLIANCE
CAPILLARY DRAIN
CLOSURE CELL BOUNDARY



LEGEND

- MW36R BEDROCK MONITORING WELL
- ← DIRECTION OF FLOW
- - - POINT OF COMPLIANCE
- CLOSURE CELL BOUNDARY

NOTES:

1. TOPOGRAPHICAL INFORMATION SUPPLIED BY
AERO-METRIC ENGINEERING, INC.

Surveyed Ground Surface Elevations

WELLID#	FEET, MSL
MW-14R	606.1
MW-15R	604.1
MW-16R	610.6
MW-20R	611.0
MW-24R	612.6
MW-30R	607.7
MW-36R	609.3
MW-37R	613.2

DIRECTION OF GROUNDWATER FLOW

MW24R



338

RUST ENVIRONMENTAL
INFRASTRUCTURE

SIGNATURE

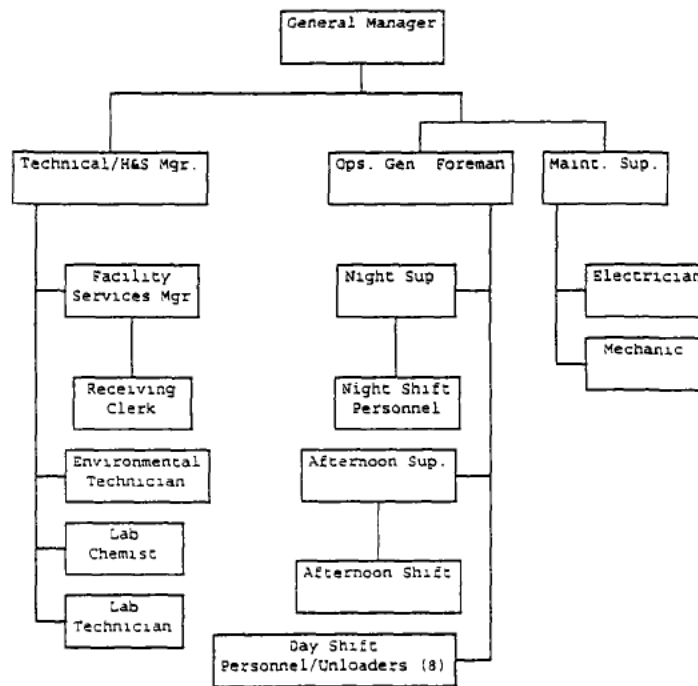
DATE

REV.	DATE	DRN BY	APP BY
DATE:	11/23/98	PROJECT NO.	202633
DES BY	AMF	SCALE:	AS NOTED
DRN BY	VPR	PROJECT:	VICKERY, OHIO FACILITY
CHK BY	MFB	CLOSURE CELL AND BACKGROUND MONITORING WELLS	
REV BY	MTG		
APP BY	MFB		



Waste Management of Ohio, Inc.

SHEET 1 OF 1
FIGURE NO.
E-15





Vickery Environmental, Inc.
A Waste Management Company
3956 State Route 412
Vickery, Ohio 43464
419-547-7791
Fax: 419-547-6144

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7099 3400 0008 3893 8292

April 21, 2000

Mr. Frances Lyons
Regional Administrator
U.S. Environmental Protection Agency Region V
77 W. Jackson Blvd.
Chicago, IL 60609

Re: Waste Management of Ohio, Inc. - Vickery, Ohio
OHD 020 273 819
RCRA Class 1 Permit Modification

Dear Mr. Lyons:

Waste Management of Ohio, Inc. Vickery facility, (WMO), (now known as Vickery Environmental, Inc. (VEI)), received US EPA's correspondence dated March 21, 2000 which approved the Class 1* Permit Modification submitted by WMO on January 3, 2000. VEI provides the following clarification on this ownership change. WMI Medical Services, Inc. and Vickery Environmental, Inc. were not two separate corporations. WMI Medical Services, Inc. was the original name and this entity then changed it's name to Vickery Environmental, Inc. so that when the transfer of assets occurred, this step would not be necessary. This name change of WMI Medical Services, Inc. to Vickery Environmental, Inc. occurred on December 27, 1999. Hence, there was only one transfer of ownership and operational control of the facility, which became effective April 21, 2000.

In review of the documentation submitted, VEI has determined that the Part A Application should be updated. VEI submits this Class 1 modification to update the facility's Part A Application. Section VIII.A., "Name of Facility's Legal Owner," and

Vickery Environmental, Inc.

RECEIVED
APR 26 2000

DIVISION FRONT OFFICE
Waste, Pesticides & Toxics Division
U.S. EPA - REGION 5

RECEIVED
MAY 01 2000

WASTE MANAGEMENT BRANCH
Waste, Pesticides & Toxics Division
U.S. EPA - REGION 5

RECEIVED

APR 25 2000

U.S. EPA REGION 5
OFFICE OF REGIONAL ADMINISTRATOR

Mr. Frances Lyons
April 21, 2000
Page 2

Section XVIII., "Certifications," have been updated to reflect that the name of the legal owner is be Vickery Environmental, Inc.

This modification meets the criteria of A.I. of Appendix I to 40 CFR 270.42, Administrative and Information Changes. Included as Attachment 1 is a revised Part A Application signed by a responsible corporate officer confirming that both the owner and operator are Vickery Environmental, Inc.

The applicable information required by 40 CFR 270.13 through 270.21, 270.62 and 270.63 is included as Attachment 2 to this letter.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,
VICKERY ENVIRONMENTAL, INC.



Stephen C. Lonneman
General Manager


SCL/slc

Attachments

cc w/: Marty Paulrabhu, USEPA Region V:
via Mail Code DRP-8J
via e-mail - hejmad.paulrabhu@epa.gov

Vickery Environmental, Inc.

ATTACHMENT 1
REVISED PART A APPLICATION

For EPA Regional Use Only		 United States Environmental Protection Agency Washington, DC 20460 Hazardous Waste Permit Application Part A (Read the Instructions before starting)			
Date Received					
Month	Day			Year	
I. Facility's EPA ID Number (Mark 'X' in the appropriate box)					
<input type="checkbox"/> A. First Part A Submission		<input checked="" type="checkbox"/> B. Part A Amendment #			
C. Facility's EPA ID Number		D. Secondary ID Number (if applicable)			
O H D O 2 0 2 7 3 8 1 9					
II. Name of Facility					
V I C K E R Y E N V I R O N M E N T A L , I N C .					
III. Facility Location (Physical address not P.O. Box or Route Number)					
A. Street					
3 9 5 6 S T A T E R O U T E 4 1 2					
Street (Continued)					
City or Town				State	Zip Code
V I C K E R Y				O H	4 3 4 6 4 -
County Code (if known)		County Name			
O 7 2		S A N D U S K Y			
B. Land Type		C. Geographic Location		D. Facility Existence Date	
(Enter code)		LATITUDE (Degrees, minutes, & seconds)		LONGITUDE (Degrees, minutes, & seconds)	
P		4 1 2 2 1 9 N		0 8 2 5 8 4 0 W	
				Month	Day
				1 1	1 9
				1 9	8 0
IV. Facility Mailing Address					
Street or P.O. Box					
3 9 5 6 S T A T E R O U T E 4 1 2					
City or Town				State	Zip Code
V I C K E R Y				O H	4 3 4 6 4 -
V. Facility Contact (Person to be contacted regarding waste activities at facility)					
Name (Last)			Name (First)		
L O N N E M A N			S T E P H E N		
Job Title			Phone Number (Area Code and Number)		
G E N E R A L M A N A G E R			4 1 9 - 5 4 7 - 7 7 9 1		
VI. Facility Contact Address (See Instructions)					
A. Contact Address Location Mailing Other		B. Street or P.O. Box			
<input checked="" type="checkbox"/>					
City or Town				State	Zip Code

EPA ID Number (Enter from page 1)												Secondary ID Number (Enter from page 1)											
O H D 0 2 0 2 7 3 8 1 9																							
VII. Operator Information (See instructions)																							
Name of Operator																							
V I C K E R Y E N V I R O N M E N T A L , I N C .																							
Street or P.O. Box																							
3 9 5 6 S T A T E R O U T E 4 1 2																							
City or Town												State		ZIP Code									
V I C K E R Y												O H		4 3 4 6 4 -									
Phone Number (Area Code and Number)												B. Operator Type		C. Change of Operator Indicator		Date Changed Month		Day		Year			
4 1 9 - 5 4 7 - 7 7 9 1												P		Yes X No		0 4		2 1		2 0 0 0			
VIII. Facility Owner (See instructions)																							
A. Name of Facility's Legal Owner																							
V I C K E R Y E N V I R O N M E N T A L , I N C .																							
Street or P.O. Box																							
3 9 5 6 S T A T E R O U T E 4 1 2																							
City or Town												State		ZIP Code									
V I C K E R Y												O H		4 3 4 6 4 -									
Phone Number (Area Code and Number)												B. Owner Type		C. Change of Owner Indicator		Date Changed Month		Day		Year			
4 1 9 - 5 4 7 - 7 7 9 1												P		Yes X No		0 4		2 1		2 0 0 0			
IX. NAICS Codes (in order of significance; start in left box)																							
First												Third											
4 9 5 3																							
(Description) Hazardous Waste Mgmt Services												(Description)											
Second												Fourth											
(Description)												(Description)											
X. Other Environmental Permits (See instructions)																							
A. Permit Type (Enter code)				B. Permit Number												C. Description							
N				2 I N 0 0 0 1 6 * F D												NPDES Stormwater							
R				O H D 0 2 0 2 7 3 8 1 9												USEPA Hazardous Waste Management							
U				0 3 - 7 2 - 0 0 9												UIC Well #2							
U				0 3 - 7 2 - 0 1 1												UIC Well #4							
U				0 3 - 7 2 - 0 1 2												UIC Well #5							
U				0 3 - 7 2 - 0 1 3												UIC Well #6							
E				0 3 - 7 2 - 0 0 0 1 0 5												Air Permits P001, T007-8, T017-20, T022-25, T036-41							
E				N A												USEPA TSCA Appr. Ltr. (9/25/95)							

EPA ID Number (Enter from page 1)

Secondary ID Number (Enter from page 1)

O H D O 2 0 2 7 3 8 1 9

XI. Nature of Business (Provide a brief description)

The Vickery facility receives aqueous wastes for treatment and storage in a series of treatment and disposal tanks. These wastes are filtered, blended, and disposed of through deep injection wells. A closure cell which contains the closure material from clean closed surface impoundments is located on the site.

XII. Process Codes and Design Capacities

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Thirteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in item XIII.

B. PROCESS DESIGN CAPACITY - For each code entered in column A, enter the capacity of the process.

1. AMOUNT - Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

C. PROCESS TOTAL NUMBER OF UNITS - Enter the total number of units used with the corresponding process code.

APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY			APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY		
PROCESS CODE	PROCESS		PROCESS CODE	PROCESS	
<u>Disposal:</u>					
D79	Underground Injection	Gallons; Liters; Gallons Per Day; or Liters Per Day	T81	Cement Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
D80	Well Disposal	Acre-feet; Hectare-meter; Acres; Cubic Meters; Hectares; Cubic Yards	T82	Lime Kiln	
D81	Land Application		T83	Aggregate Kiln	
D82	Ocean Disposal	Acres or Hectares	T84	Phosphate Kiln	
D83	Surface Impoundment	Gallons; Liters; Cubic Meters; or Cubic Yards	T85	Coke Oven	
D99	Other Storage	Any Unit of Measure Listed Below	T86	Blast Furnace	
<u>Storage:</u>					
S01	Container	Gallons; Liters; Cubic Meters; or Cubic Yards	T87	Smelting, Melting, Or Refining Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Gallons Per Hour; Liters Per Hour; or Million Btu Per Hour
S02	Tank Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T88	Titanium Dioxide	
S03	Waste Pile	Cubic Yards or Cubic Meters	T89	Chloride Oxidation Reactor	
S04	Surface Impoundment	Gallons; Liters; Cubic Meters; or Cubic Yards	T90	Methane Reforming	
S05	Storage	Gallons; Liters; Acres; Cubic Meters; Hectares; or Cubic Yards	T91	Furnace	
S06	Drip Pad		T92	Pulping Liquor Recovery	
S99	Other Disposal	Any Unit of Measure Listed Below	T93	Combustion Device Used In The Recovery Of Sulfur Values From Spent Sulfuric Acid	
<u>Treatment:</u>					
T01	Tank Treatment	Gallons Per Day; Liters Per Day; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; or Metric Tons Per Hour	T94	Halogen Acid Furnaces	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Gallons Per Hour; Liters Per Hour; or Million Btu Per Hour
T02	Surface Impoundment Treatment	Gallons Per Day; Liters Per Day; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; or Metric Tons Per Hour	T93	Other Industrial Furnaces Listed in 40 CFR §260.10	
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million Btu Per Hour	T94	Containment Building - Treatment	
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Gallons Per Day; Liters Per Hour; or Million Btu Per Hour			
T80	Boiler	Gallons; Liters; Gallons Per Hour; Liters Per Hour; Btu Per Hour; or Million Btu Per Hour			
		Gallons; Liters; Gallons Per Hour; Liters Per Hour; Btu Per Hour; or Million Btu Per Hour			
			<u>Miscellaneous (Subpart X):</u>		
			X01	Open Burning/Open Detonation	Any Unit of Measure Listed Below
			X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; Kilograms Per Hour; Gallons Per Hour; Liters Per Hour; or Gallons Per Day
			X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; or Million Btu Per Hour
			X04	Geologic Repository	Cubic Yards; Cubic Meters; Acre-feet; Hectare-meter; Gallons; or Liters
			X99	Other Subpart X	Any Unit of Measure Listed Below

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons	G	Short Tons Per Hour	D	Cubic Yards	Y
Gallons Per Hour	E	Metric Tons Per Hour	W	Cubic Meters	C
Gallons Per Day	U	Short Tons Per Day	N	Acres	B
Liters	L	Metric Tons Per Day	S	Acre-feet	A
Liters Per Hour	H	Pounds Per Hour	J	Hectares	Q
Liters Per Day	V	Kilograms Per Hour	R	Hectare-meter	F
		Million Btu Per Hour	X	Btu Per Hour	I

EPA ID Number (Enter from page 1)

Secondary ID Number (Enter from page 1)

O H D 0 2 0 2 7 3 8 1 9

XII. Process Codes and Design Capabilities (Continued)

EXAMPLE FOR COMPLETING ITEM XII (shown in line number X-1 below): A facility has a storage tank, which can hold 533.788 gallons.

Line Number	A. Process Code (From list above)				B. PROCESS DESIGN CAPACITY		C. Process Total Number Of Units	For Official Use Only			
					1. Amount (Specify)	2. Unit Of Measure (Enter code)					
X 1	S	0	2		5 3 3 . 7 8 8	G	0 0 1				
1	S	0	2		1097050.	G	0 1 9				
2	T	0	4		650000.	U	0 0 3				
3	T	0	1		650000.	U	0 1 9				
4	D	7	9		2400000000.	G	0 0 4				
5	D	8	3		425000.	Y	0 0 1				
6					.						
7					.						
8					.						
9					.						
1 0					.						
1 1					.						
1 2					.						
1 3					.						

NOTE: If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in item XIII.

XIII. Other Processes (Follow instructions from item XII for D99, S99, T04 and X99 process codes)

Line Number (Enter #s in seg w/XII)	A. Process Code (From list above)				B. PROCESS DESIGN CAPACITY		C. Process Total Number Of Units	D. Description Of Process			
					1. Amount (Specify)	2. Unit Of Measure (Enter code)					
X 1	T	0	4		.			In-situ Vittrification			
1					.						
2	T	0	4		650000.	U	0 0 3	Filtration			
3					.						
4					.						

EPA ID Number (Enter from page 1)												Secondary ID Number (Enter from page 1)											
O	H	D	0	2	0	2	7	3	8	1	9												

XIV. Description of Hazardous Wastes

- A. EPA HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR, Part 261 Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in item XII A. on page 3 to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in item XII A. on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

- Enter the first two as described above.
- Enter "000" in the extreme right box of item XIV-D(1).
- Use additional sheet, enter line number from previous sheet, and enter additional code(s) in item XIV-E.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form (D.(2)).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "Included with above" and make no other entries on that line.
- Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A. EPA HAZARD WASTE NO. (Enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESS	
				(1) PROCESS CODES (Enter)	(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
X 1	K 0 5 4	900	P	T 0 3 D 8 0	
X 2	D 0 0 2	400	P	T 0 3 D 8 0	
X 3	D 0 0 1	100	P	T 0 3 D 8 0	
X 4	D 0 0 2				Included With Above

EPA ID Number (Enter from page 1)

Secondary ID Number (Enter from page 1)

O H D 0 2 0 2 7 3 8 1 9

XIV. Description of Hazardous Wastes (Continued; use additional sheets as necessary)

Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES	
				(1) PROCESS CODES (Enter code)	(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
1	*	630,500.	T		*See attached page of
2					the Part B Permit.
3					Individual waste codes
4					are not regulated
5					by the estimated annual
6					quantity, but are limited
7					to an overall facility
8					throughput of 630,500 tons.
9					Basis 126,000,000 gallons
10					converted to tons on a
11					specific gravity of 1.2.
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					
29					
30					
31					
32					
33					

IV. TOXICITY CHARACTERISTIC

A. WASTE IDENTIFICATION

Early Terminated

B. WASTE CHARACTERIZATION

Early Terminated

C. OTHER WASTE IDENTIFICATION

The Permittee may store, treat and dispose of the following wastes in tanks, filtration unit and injection wells at the facility subject to the terms of the RCRA permit.

Description of Hazardous Waste	EPA Hazardous Waste Number	Maximum Volume	Description of Units
Liquid Waste	See list below	1,102,600 gallons	Tank Storage (S02)
Liquid Waste	See list below	650,000 gallons/day	Treatment in Tanks (T01)
Liquid Waste	See list below	650,000 gallons/day	Filtration (T04)
Liquid Waste	See list below	2.4x10 ⁹	Injection Well Disposal (D79)

EPA Hazardous Waste Numbers: K140, K169, K170, K171, K172, U408

D. CONDITIONS REGARDING UNITS

1. All units described in Condition IV.A. above shall be operated in accordance with the State permit conditions and the State Underground Injection Control Permit conditions pertaining to those units.
2. The Permittee shall follow the waste analysis procedures required in 40 CFR Part 264, and as described in the Waste Analysis plan found in Attachment III.

EPA ID Number (Enter from page 1)												Secondary ID Number (Enter from page 1)											
0	H	D	0	2	0	2	7	3	8	1	9												

XV. Map

Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

XVI. Facility Drawing

All existing facilities must include a scale drawing of the facility (See instructions for more detail).

XVII. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

XVIII. Certification(s)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Owner Signature

Date Signed

Name and Official Title (Type or print)

Thomas R. Koogler, Vice President, Vickery Environmental, Inc.

Owner Signature

Date Signed

Name and Official Title (Type or print)

Operator Signature

Date Signed

Name and Official Title (Type or print)

Operator Signature

Date Signed

Name and Official Title (Type or print)

XIX. Comments

Vickery Environmental, Inc. will become the new owner and operator of the Waste Management of Ohio, Inc. Vickery facility. This restructuring will affect no change in the facility's operations or personnel.

Note: Mail completed form to the appropriate EPA Regional or State Office. (Refer to instructions for more information)

ATTACHMENT 2

SUMMARY OF RULE REQUIREMENTS AND FACILITY RESPONSE

Summary of Rule Requirements and Facility Response

Class 1* Modification 40 CFR 270.42(a)(1)...	Rule Requirement	Facility Response	
(i)	Notification to Director	This letter is the notification.	
(i)	Changes being made to Permit Conditions	There are no requested changes to Permit Conditions.	
(i)	Why Modification Needed	This modification is necessary to update the facility's Part A application, clarifying that the current owner and operator of the facility is Vickery Environmental, Inc.	
(i)	Information Required by 40 CFR 270.13-270.21; 270.62; 270.63.	See information provided below.	
	40 CFR 270.13-Part A	See Attachment 1 for the Federal Part A Application.	
(i)	40 CFR 270.14-Part B	This request is to allow the following to continue: treatment (T01) and storage (S02) in tanks, filtration (T04) and injection well disposal (D79). There are no revisions to the Part B Application. This change is purely administrative in nature and will not require any additional or different management practices. There will be no addition to or change in the treatment process. Blending of wastes will still occur in tanks. Filtration of the waste stream will occur in the existing, permitted filtration operations. All wastes will pass the currently approved Waste Analysis Plan requirements. No new fire protection is required.	
(i)	40 CFR 270.15-Containers	The facility does not manage hazardous wastes in these types of units under this rule.	
	40 CFR 270.17 to 40 CFR 270.21; 40 CFR 270.62 and 40 CFR 270.63 Surface Impoundments, waste piles, incinerators, land treatment.	The facility does not manage hazardous wastes in these types of units.	

Summary of Rule Requirements and Facility Response

Class 1* Modification 40 CFR 270.42(a)(1)...	Rule Requirement	Facility Response	
(i)	40 CFR 270.16-Tanks	There are no revisions to the Part B Application. This change is purely administrative in nature and will not require any additional or different management practices. There will be no addition to or change in the treatment process. Blending of wastes will still occur in tanks. Filtration of the waste stream will occur in the existing, permitted filtration operations. All wastes will pass the currently approved Waste Analysis Plan requirements. No new fire protection is required.	
(ii)	Notification to Mailing List	WMO will send notification of the modification to all persons on the facility mailing list, as maintained by the Director and all appropriate State and local government. These notifications will be made within 90 days after April 21, 2000.	

WASTE MANAGEMENT OF OHIO, INC.

3956 STATE ROUTE 412 • VICKERY, OHIO 43464 • 419-547-7791 • FAX: 419-547-6144

AIRBORNE EXPRESS

Airbill #3643931281

January 3, 2000

Mr. Frances Lyons
Regional Administrator
U.S. Environmental Protection Agency Region V
77 W. Jackson Blvd.
Chicago, IL 60609

RECEIVED
JAN 03 2000
DIVISION FRONT OFFICE
Waste, Pesticides & Toxics Division
U.S. EPA - REGION 5

Re: Waste Management of Ohio, Inc. - Vickery, Ohio
OHD 020 273 819
RCRA Class 1* Permit Modification Request

Dear Mr. Lyons:

In accordance with 40 CFR 270.40, Transfer of Permits, Waste Management of Ohio, Inc. (WMO) Vickery facility submits this Class 1* Permit Modification request. It is the intention of Waste Management, Inc. to change the ownership of the Vickery Facility from Waste Management of Ohio, Inc. to an existing corporation which will hold the assets of the Vickery Facility. The corporation is WMI Medical Services, Inc. which will then change it's name to Vickery Environmental, Inc. Both corporations are wholly owned subsidiaries of Waste Management, Inc. Included in the following attachments are documents which further explain this ownership change along with the documents and information required by 40 CFR 270.40 and 40 CFR 270.42. Below is a summary of the attachments:

Attachment 1	Copy of Letter Sent to Ohio EPA Response to Specific Questions About the Planned Change of Ownership
Attachment 2	Part A Application with the appropriate signatures.
Attachment 3	Written Agreement for Transfer of Permit
Attachment 4	Summary of Rule Requirements and Facility's Response.

RECEIVED

JAN - 5 2000

U.S. EPA REGION 5
OFFICE OF REGIONAL ADMINISTRATOR

Mr. Frances Lyons
January 3, 2000
Page 2

This modification meets the criteria of A.7. of Appendix I to 40 CFR 270.42, Changes in ownership or operational control of a facility, and requires prior approval of the Regional Administrator. As noted in Attachment 2, the specific date of the planned transfer is April 30, 2000; however, WMO requests that the Regional Administrator approve a date of March 31, 2000, for the transfer, if possible.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

WASTE MANAGEMENT OF OHIO, INC.


Stephen C. Lonneman
General Manager

SCL/slc

Attachments

cc w/: Thomas W. Matheson, USEPA Region V:
 via Mail Code DRP-8j
 via e-mail - matheson.thomas@epa.gov

ATTACHMENT I

COPY OF LETTER SENT TO THE OHIO EPA

RESPONSE TO SPECIFIC QUESTIONS ABOUT THE
PLANNED CHANGE OF OWNERSHIP

FROST & JACOBS LLP

ONE COLUMBUS, SUITE 1000
10 WEST BROAD STREET
COLUMBUS, OHIO 43215-3467
(614) 464-1211 • FACSIMILE: (614) 464-1737
WEB SITE: HTTP://WWW.FROJAC.COM

CINCINNATI OFFICE
2500 PNC CENTER
201 EAST FIFTH STREET
CINCINNATI, OHIO 45202-4182
(513) 651-6800
FACSIMILE: (513) 651-6981

MIDDLETOWN OFFICE
400 FIRST NATIONAL BANK BUILDING
2 NORTH MAIN STREET
MIDDLETOWN, OHIO 45042-1981
(513) 422-2001
FACSIMILE: (513) 422-3010

KENTUCKY OFFICE
1100 VINE CENTER TOWER
333 WEST VINE STREET
LEXINGTON, KENTUCKY 40507-1634
(606) 254-1100
FACSIMILE: (606) 253-2990

ROBERT E. LEININGER*
rleining@frojac.com
(614) 464-1211 ext. 225
*Not Admitted in Ohio

12/28/99

Todd A. Anderson
Staff Attorney
Ohio Environmental Protection Agency
Lazarus Garment Center
122 South Front Street
Columbus, OH 43215

Re: Waste Management of Ohio, Inc. – Vickery Facility

Dear Todd:

As I have advised in previous correspondence, it is the intention of Waste Management to change the ownership of the Vickery Facility from Waste Management of Ohio, Inc. to a new corporation which will hold the assets of the Vickery Facility. The name of the new corporation will not be Vickery Disposal Facility, Inc. but will be Vickery Environmental, Inc.

Waste Management currently has a corporation called WMI Medical Services, Inc. which, at one time, had permitted medical waste incinerator facilities as part of its assets. Waste Management no longer operates these types of facilities in Ohio and it no longer has any permits to operate medical waste incineration facilities. Consequently, this corporate entity is not engaged in any current ongoing operations. It is the intention of Waste Management to change the name of this corporation to Vickery Environmental, Inc. and transfer the assets of the Vickery facility to Vickery Environmental, Inc.

In order to do so, WMO is required to comply with the regulatory requirements for transfer of permits. As indicated in your letter to me, the facility's hazardous waste facility installation and operation permit will be required to be modified as a Class 3 permit modification. Since there will be a change in the owner and/or operator of the facility. You have requested certain information relating to the change in ownership in order to facilitate your review of the request for the permit modification. The purpose of this letter is to respond to your request to provide such information.

Todd A. Anderson
December 27, 1999
Page 2

1. *Request: Please list the names and titles of the officers and directors of the existing permittee (Waste Management of Ohio, Inc.) and describe any changes or expected changes to those officers and directors as a result of the creation of the new corporation (Vickery Disposal Facility, Inc.). Please list the names and titles of the officers and directors of the new corporation (Vickery Disposal Facility, Inc.). Include, if possible, the names and titles of any new officers and directors expected to be named as a result of the reorganization of the new corporation.*

Response: The names and titles of the officers and directors of Waste Management of Ohio, Inc., the existing permittee are attached hereto as Attachment A. The names and titles of the officers and directors of Vickery Environmental, Inc. are attached hereto as Attachment B. As you can see, there will be no changes made to the names or titles of the officers and directors as the result of this change in ownership.

2. *Request: Please explain the decision-making hierarchy/process that exists (or will exist) between Vickery Disposal Facility, Inc. and parent entities. Please also include a detailed discussion of parent entities' participation (or planned participation) in the day-to-day operations of the permitted facility after the creation of Vickery Disposal Facility, Inc. with emphasis on day-to-day environmental compliance matters.*

Response: All of the day-to-day operations of the permitted facility, as well as the day-to-day environmental compliance management occurs among the facility personnel. Attached hereto as Attachment C is an organizational chart for the Vickery Facility which shows the various responsibilities of facility personnel. None of the current parent corporations of WMO are involved in the day-to-day decision-making process for the facility, and the parent companies of Vickery Environmental, Inc. will also not be involved in the day-to-day decision-making process.

- a. *List the names and titles of the environmental managers/compliance officers for Vickery Disposal Facility, Inc. Please also indicate if these individuals are employed (or will be employed) by Vickery Disposal Facility, Inc. If any of these individuals are not employed (or will not be employed) by Vickery Disposal Facility, Inc., please indicate by whom they will be employed;*

The names and titles of the environmental managers/compliance officers for the Vickery Facility will not change as the result of the change in ownership. These individuals are as follows: Steve Lonneman, General Manager; Robin Wuertz, Technical Manager; and Sandra Clark, Environmental Technician. All of these

Todd A. Anderson
December 27, 1999
Page 3

individuals are currently employed by WMO and will be employed by Vickery Environmental, Inc. following the change in ownership.

- b. *List the names and titles of the supervisors of the persons listed above and include a table of organization. Please indicate by whom these individuals are (will be) employed;*

As indicated in Attachment C, Robin Wuertz reports to the General Manager, Steve Lonneman and Sandra Clark reports to Robin Wuertz. Mr. Lonneman reports to Thomas Koogler, Vice President and Region Manager for the Ohio, Kentucky, West Virginia Region of Waste Management. Mr. Koogler reports to Charles Wilcox, who is the Vice President and Area Manager for the East Area of Waste Management, which includes Mr. Koogler's region as well as seven other states. Mr. Wilcox reports to E. Maurice Myers, President and Chief Executive Officer of Waste Management, Inc. Mr. Koogler, Mr. Wilcox and Mr. Myers all are employees of Waste Management, Inc.

- c. *Discuss any changes or contemplated changes to the permitted facility's environmental compliance officers and decision-making hierarchy as a result of the creation of Vickery Disposal Facility, Inc.*

There will be no changes or contemplated changes to the permitted facility's environmental compliance officers and decision-making hierarchy as a result of the creation of Vickery Environmental, Inc.

3. *Request: Please describe the financial relationship (or planned financial relationship) between the parent entities and Vickery Disposal Facility, Inc.;*

- a. *Please describe the current monetary control of and/or fiscal responsibility for Waste Management of Ohio, Inc. Describe any changes to the monetary control of and/or fiscal responsibility for the permitted facility which will occur as a result of the creation of Vickery Disposal Facility, Inc. Please include in this description a detailed discussion of operating budgets, accounts, expenditures for improvements, pollution control equipment, etc. at the permitted facility before and after the creation of Vickery Disposal Facility, Inc.*

Response: There will be no changes to the monetary control of and/or fiscal responsibility for the permitted facility as the result of the creation of Vickery Environmental, Inc. Responsibility for managing the finances of the facility and

Todd A. Anderson
December 27, 1999
Page 4

preparing an operating budget has always been undertaken at the facility level by the General Manager of the facility and the Controller for the facility. As indicated above, Steve Lonneman is the General Manager of the facility under the current ownership of WMO and will remain as the General Manager following the change in ownership. As indicated on Attachment C, Martin Ellard is the facility's Controller and he will remain as the Controller following the change in ownership.

Mr. Ellard and Mr. Lonneman prepare an annual operating budget for each fiscal year, which is based upon the calendar year. Once this budget is prepared it is then submitted to Region management for approval. Following approval by Region management, the budget for the facility is then sent to the management of the East Area for approval and once they have approved it, it is submitted to the corporate office of Waste Management, Inc. in Houston, Texas for final approval. There are no changes in the budget approval process which will occur as the result of the change in ownership of the facility.

The operating budget for the facility consists of three general areas: 1) estimated revenue; 2) operating expenses; and 3) capital expenditures.

Management prepares the estimated revenue aspect of the budget based upon estimated receipts from current and future customers during the next fiscal year in payment for waste disposal services which are provided by the facility.

The operating expenses are based upon an estimate of the salaries and benefits for facility personnel, estimated costs of supplies for the year, including office supplies, equipment filters and other materials needed to be provided in order to undertake the waste disposal services which are offered by the facility. Operating expenses also include facility maintenance costs paid to outside contractors, utilities, taxes and other related costs which will be incurred by the facility during that fiscal year.

The capital expenditures are set forth based upon the estimated cost for equipment that may need to be replaced during the course of the year. The facility has no specific plans for equipment replacement but provides an estimate in the budget for this type of expenditure based upon its knowledge that, during the course of a year, equipment replacement may be necessary. No capital expenditures for new pollution control equipment have been budgeted. There will be no change in this budgeting process as the result of the change in ownership of the facility.

Todd A. Anderson
December 27, 1999
Page 5

4. *Request: Please describe the current and new/prospective financial assurance arrangements, including an explanation of the current financial assurance mechanisms established by Waste Management of Ohio, Inc. or other entity on behalf of Waste Management of Ohio, Inc. for both closure and post-closure and liability coverage and any changes (or anticipated changes) occasioned by the creation of Vickery Disposal Facility, Inc. Describe any other intended/contemplated changes in the permitted facility or its operations including personnel, activities, environmental compliance measures etc. occasioned as a result of the corporate reorganization and creation of Vickery Disposal Facility, Inc.*

Response: WMO currently provides financial assurance for closure and post-closure of the Vickery Facility pursuant to insurance in the appropriate amount issued by National Guarantee Insurance Company. WMO also has insurance in the appropriate amounts for the facility to cover sudden and non-sudden accidental occurrences through its insurer, American International Specialty Lines Insurance Company. Attached hereto as Attachment D are Certificates of Insurance for the closure and post-closure of the facility and for sudden and non-sudden accidental occurrences. There will be no change in the financial assurance mechanisms for the facility based upon the change in ownership other than to change the name of the insured from Waste Management of Ohio, Inc. to Vickery Environmental, Inc. There will be no changes in the permitted facility or its operations including personnel, activities, environmental compliance measures or any other aspect of the facility activities as the result of the change in corporate ownership of the facility.

5. *Request: Identify the person(s) who currently owns the majority or controlling interest of the real property, buildings, fixtures and equipment at the permitted facility and any changes to the ownership which have occurred or will occur as a result of the creation of the Vickery Disposal Facility, Inc.*

Response: Waste Management of Ohio, Inc. is the current owner of all of the Vickery Facility's assets, including its property, buildings, fixtures and equipment. Following the change in ownership, Vickery Environmental, Inc. will own all of the assets of the Vickery Facility.

FROST & JACOBS LLP

Todd A. Anderson
December 27, 1999
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If you have any questions with respect to this response to your request for information,
please do not hesitate to contact me at (614) 464-1211.

Sincerely,


Robert E. Leininger

/jep

attachments

33846 01

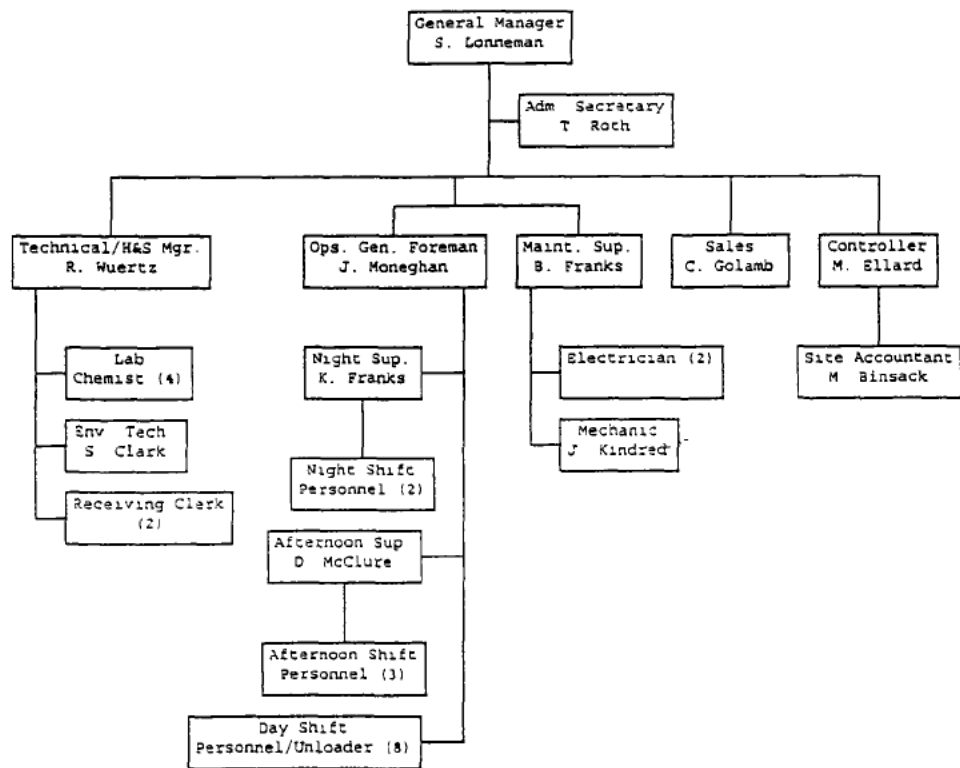
ATTACHMENT A**Waste Management of Ohio, Inc. Officers and Directors**

NAME	TITLE
Charles A. Wilcox	President
Bryan J. Blankfield	Vice President, Secretary and Sole Director
Bruce E. Snyder	Vice President, Chief Accounting Officer and Assistant Secretary
Ronald H. Jones	Vice President and Treasurer
Thomas R. Koogler	Vice President
Vahè Gabriel	Vice President
John S. Skoutelas	Vice President and Assistant Secretary
Robert G. Simpson	Vice President and Assistant Treasurer
Jeffrey A. Draper	Vice President and Assistant Treasurer
Lee A. McCormick	Assistant Treasurer

ATTACHMENT B

WMI Medical Services of Ohio, Inc. Officers and Directors
(Name to be changed to Vickery Environmental, Inc.)

NAME	TITLE
Charles A. Wilcox	President
Bryan J. Blankfield	Vice President, Secretary and Sole Director
Bruce E. Snyder	Vice President, Chief Accounting Officer and Assistant Secretary
Ronald H. Jones	Vice President and Treasurer
Thomas R. Koogler	Vice President
Vahè Gabriel	Vice President
John S. Skoutelas	Vice President and Assistant Secretary
Robert G. Simpson	Vice President and Assistant Treasurer
Jeffrey A. Draper	Vice President and Assistant Treasurer
Lee A. McCormick	Assistant Treasurer



NATIONAL GUARANTY INSURANCE COMPANY Attachment D

7 BURLINGTON SQUARE, 6th FLOOR • BURLINGTON, VT 05401 • 1-800-876-6442

CERTIFICATE OF INSURANCE CLOSURE AND POST-CLOSURE

Name and Address of Insurer (hereinafter called the "Insurer"):

NATIONAL GUARANTY INSURANCE COMPANY OF VERMONT

7 Burlington Square, 6th Floor, P.O. Box 530 Burlington, Vermont 05402-0530

Name and Address of Insured (hereinafter called the "Insured"):

WASTE MANAGEMENT OF OHIO, INC.

3956 State Route 412, Vickery, Ohio 43464

Facilities Covered:

EPA ID Number: OHDO20273819

Ohio Permit Number: OHDO20273819

Name: Vickery Landfill

Address: 3956 State Route 412

Vickery, OH 43464

Policy Face Amount: \$8,392,539.00

Closure: A. \$3,316,180.00

Post-Closure B. \$5,076,359.00

Policy Number: CPCH92-0003

Effective Date: March, 1, 1992

The Insurer hereby certifies that it has issued to the Insured the policy of insurance identified above to provide financial assurance for closure and post-closure care for the facility identified above. The Insurer further warrants that such policy conforms in all respects with the requirements of Paragraph (E) of Rules 3745-55-43 and 3745-55-45, and Paragraph (D) of Rules 3745-66-43 and 3745-66-45 of the Administrative Code, as applicable and as such rules were constituted on the date shown immediately below. It is agreed that any provision of the policy inconsistent with such rules is hereby amended to eliminate such inconsistency.

Whenever requested by the Director of the Ohio Environmental Protection Agency, the Insurer agrees to furnish to the Director a duplicate original of the policy listed above including all endorsements thereon.

I hereby certify that the wording of this certificate is identical to the wording specified in Paragraph (E) of Rule 3745-55-51 of the Administrative code as such rules were constituted on the date shown immediately below.

Leo J. Winstead
Authorized signature for Insurer

January 7, 1999
Date

Leo J. Winstead

Name of person signing

Attorney-in-fact

Title of person signing

Debra Krensch
Witness

HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

1. American International Specialty Lines Insurance Company, (the "Insurer"), of Harborside Financial Center, 401 Plaza Three, Jersey City, New Jersey 07311 hereby certifies that it has issued liability insurance covering bodily injury and property damage to Waste Management, Inc. and its subsidiaries (the "Insured") of 1001 Fannin, Suite 4000, Houston, TX 77002 in connection with the Insured's obligation to demonstrate financial responsibility under rule 3745-55-47 and 3745-66-47 of the Administrative Code. The coverage applies at:

EPA ID No.
OHD 020273819

Ohio Permit #
03-72-0191

Name, Address
Waste Management of Ohio, Inc.
3956 State Route 412
Vickery, OH 43464

for sudden accidental occurrences. The limits of liability are \$1,000,000 for each occurrence and \$2,000,000 annual aggregate, exclusive of legal defense costs. The coverage provided under policy number PLS 8194904, issued on July 16, 1998. The effective date of said policy is January 1, 1998.

2. The Insurer further certifies the following with respect to the insurance described in paragraph 1:
 - (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.
 - (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in paragraph (F) of rule 3745-55-47 or paragraph (F) of rule 3745-66-47 of the Administrative Code..
 - (c) Whenever requested by the Director of the Ohio Environmental Protection Agency, the Insurer agrees to furnish to the Director a signed duplicate original of the policy and all endorsements.
 - (d) Cancellation of the insurance, whether by the Insurer, the insured, a parent corporation providing insurance coverage for its subsidiary, or by a firm having an insurable interest in and obtaining liability insurance on behalf of the owner or operator of the hazardous waste management facility, will be effective only upon will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Director.
 - (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Director.

I hereby certify that the wording of this instrument is identical to the wording specified in paragraph (J) of 3745-55-51 of the Administrative Code as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.



Stuart Samuel
Middle Market Manager, Environmental Division
Authorized Representative
AIG Environmental
Morris Corporate Center II
One Upper Pond Road, Bldg D, 2nd Fl.
Parsippany, NJ 07054

CERTIFICATE ISSUED TO:
Director
Ohio Environmental Protection Agency
Div. of Hazardous Waste Mgmt.
122 South Front Street
Columbus, OH 43216-0149

HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

1. American International Specialty Lines Insurance Company, (the "Insurer"), of Harborside Financial Center, 401 Plaza Three, Jersey City, New Jersey 07311 hereby certifies that it has issued liability insurance covering bodily injury and property damage to Waste Management, Inc. and its subsidiaries (the "Insured") of 1001 Fannin, Suite 4000, Houston, TX 77002 in connection with the Insured's obligation to demonstrate financial responsibility under rule 3745-55-47 and 3745-66-47 of the Administrative Code. The coverage applies at:

EPA ID No.
OHD 020273819

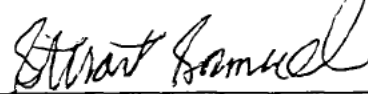
Ohio Permit #
03-72-0191

Name, Address
Waste Management of Ohio, Inc.
3956 State Route 412
Vickery, OH 43464

for non-sudden accidental occurrences. The limits of liability are \$3,000,000 for each occurrence and \$6,000,000 annual aggregate, exclusive of legal defense costs. The coverage provided under policy number PLS 8194904, issued on July 16, 1998. The effective date of said policy is January 1, 1998.

2. The Insurer further certifies the following with respect to the insurance described in paragraph 1:
 - (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.
 - (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in paragraph (F) of rule 3745-55-47 or paragraph (F) of rule 3745-66-47 of the Administrative Code.
 - (c) Whenever requested by the Director of the Ohio Environmental Protection Agency, the Insurer agrees to furnish to the Director a signed duplicate original of the policy and all endorsements.
 - (d) Cancellation of the insurance, whether by the Insurer, the insured, a parent corporation providing insurance coverage for its subsidiary, or by a firm having an insurable interest in and obtaining liability insurance on behalf of the owner or operator of the hazardous waste management facility, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Director.
 - (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Director.

I hereby certify that the wording of this instrument is identical to the wording specified in paragraph (J) of 3745-55-51 of the Administrative Code as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.


Stuart Samuel
Middle Market Manager, Environmental Division
Authorized Representative
AIG Environmental
Morris Corporate Center II
One Upper Pond Road, Bldg D, 2nd Fl.
Parsippany, NJ 07054

CERTIFICATE ISSUED TO:
Director
Ohio Environmental Protection Agency
Div. of Hazardous Waste Mgmt.
122 South Front Street
Columbus, OH 43216-0149

HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

1. American International Specialty Lines Insurance Company, (the "Insurer"), of Harborside Financial Center, 401 Plaza Three, Jersey City, New Jersey 07311 hereby certifies that it has issued liability insurance covering bodily injury and property damage to Waste Management, Inc. and its subsidiaries (the "Insured") of 1001 Fannin, Suite 4000, Houston, TX 77002 in connection with the Insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at:

EPA ID No.
OHD 020273819

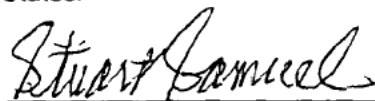
Ohio Permit #
03-72-0191

Name, Address
Waste Management of Ohio, Inc.
3956 State Route 412
Vickery, OH 43464

for sudden accidental occurrences. The limits of liability are \$1,000,000 for each occurrence and \$2,000,000 annual aggregate, exclusive of legal defense costs. The coverage provided under policy number PLS 8194904, issued on July 16, 1998. The effective date of said policy is January 1, 1998.

2. The Insurer further certifies the following with respect to the insurance described in paragraph 1:
- (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.
 - (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147 (f) or 265.147 (f).
 - (c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.
 - (d) Cancellation of the insurance, whether by the Insurer, the insured, a parent corporation providing insurance coverage for its subsidiary, or by a firm having an insurable interest in and obtaining liability insurance on behalf of the owner or operator of the hazardous waste management facility, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator of the EPA Region in which the facility is located.
 - (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator of the EPA Region in which the facility is located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151 (j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.



Stuart Samuel
Middle Market Manager, Environmental Division
Authorized Representative
AIG Environmental
Morris Corporate Center II
One Upper Pond Road, Bldg D, 2nd Fl.
Parsippany, NJ 07054

CERTIFICATE ISSUED TO:
Regional Administrator
USEPA Region 5
77 West Jackson Blvd.
Chicago, IL 60604

HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE


1. American International Specialty Lines Insurance Company, (the "Insurer"), of Harborside Financial Center, 401 Plaza Three, Jersey City, New Jersey 07311 hereby certifies that it has issued liability insurance covering bodily injury and property damage to Waste Management, Inc. and its subsidiaries (the "Insured") of 1001 Fannin, Suite 4000, Houston, TX 77002 in connection with the Insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at:

<u>EPA ID No.</u>	<u>Ohio Permit #</u>	<u>Name, Address</u>
OHD 020273819	03-72-0191	Waste Management of Ohio, Inc. 3956 State Route 412 Vickery, OH 43464

for non-sudden accidental occurrences. The limits of liability are \$3,000,000 for each occurrence and \$6,000,000 annual aggregate, exclusive of legal defense costs. The coverage provided under policy number PLS 8194904, issued on July 16, 1998. The effective date of said policy is January 1, 1998.

2. The Insurer further certifies the following with respect to the insurance described in paragraph 1:
- (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.
 - (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147 (f) or 265.147 (f).
 - (c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.
 - (d) Cancellation of the insurance, whether by the Insurer, the insured, a parent corporation providing insurance coverage for its subsidiary, or by a firm having an insurable interest in and obtaining liability insurance on behalf of the owner or operator of the hazardous waste management facility, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator of the EPA Region in which the facility is located.
 - (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator of the EPA Region in which the facility is located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151 (j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.


 Stuart Samuel
 Middle Market Manager, Environmental Division
 Authorized Representative
 AIG Environmental
 Morris Corporate Center II
 One Upper Pond Road, Bldg D, 2nd Fl.
 Parsippany, NJ 07054

CERTIFICATE ISSUED TO:
 Regional Administrator
 USEPA Region 5
 77 West Jackson Blvd.
 Chicago, IL 60604

ATTACHMENT 2
PART A APPLICATION

For EPA Regional Use Only		EPA			
		United States Environmental Protection Agency Washington, DC 20460			
		Hazardous Waste Permit			
		Application			
		Part A			
		(Read the instructions before starting)			
I. Installation's EPA ID Number (Mark 'X' in the appropriate box)					
<input type="checkbox"/> A. First Part A Submission			<input checked="" type="checkbox"/> B. Part A Amendment # _____		
C. Installation's EPA ID Number			D. Secondary ID Number (If applicable)		
OHD020273819					
II. Name of Facility					
VICKERY ENVIRONMENTAL, INC.					
III. Facility Location (Physical address not P.O. Box or Route Number)					
A. Street					
3956 State Route 412					
Street (Continued)					
City or Town				State	Zip Code
Vickery				OH	43464
County Code (if known)	County Name				
072	Sandusky				
B. Land Type	C. Geographic Location			D. Facility Existence Date	
(Enter code)	LATITUDE (Degrees, Minutes, & Seconds) LONGITUDE (Degrees, Minutes & Seconds)			Month	Day Year
P	41 22 19N 082 58 40W			11	19/1980
IV. Facility Mailing Address					
Street or P.O. Box					
3956 State Route 412					
City or Town				State	Zip Code
Vickery				OH	43464
V. Facility Contact (Person to be contacted regarding waste activities at facility)					
Name (Last)			(First)		
LONNEMAN			STEPHEN		
Job Title			Phone Number (Area Code and Number)		
General Manager			419-547-7791		
VI. Facility Contact Address (See instructions)					
A. Contact Address		B. Street or P.O. Box			
Location Mailing Other					
<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>					
City or Town				State	Zip Code

EPA I.D. Number (Enter from page 1)		Secondary ID Number (Enter from page 1)			
OHD020273819					
VII. Operator Information (See instructions)					
Name of Operator					
VICKERY ENVIRONMENTAL, INC.					
Street or P.O. Box					
3956 State Route 412					
City or Town		State	ZIP Code		
Vickery		OH	43464		
Phone Number (Area Code and Number)		B. Operator Type	C. Change of Operator Indicator		
419-547-7791		<input type="checkbox"/> P	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
		Date	Changed		
		Month	Day Year		
		04/30	/00		
VIII. Facility Owner (See instructions)					
A. Name of Facility's Legal Owner					
WMI MEDICAL SERVICES OF OHIO, INC.					
Street or P.O. Box					
3956 STATE ROUTE 412					
City or Town		State	ZIP Code		
VICKERY		OH	43464		
Phone Number (Area Code and Number)		B. Owner Type	C. Change of Owner Indicator		
419-547-7791		<input type="checkbox"/> P	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
		Date	Changed		
		Month	Day Year		
		04/30	/00		
IX. SIC Codes (4-digit, in order of significance)					
Primary		Secondary			
4953	(Description) Hazardous Waste Mgmt Services	(Description)			
Secondary		Secondary			
	(Description)	(Description)			
X. Other Environmental Permits (See instructions)					
A. Permit Type (Enter code)		B. Permit Number		C. Description	
N		2IN00016*FD		NPDES Stormwater	
R		OHD020273819		USEPA Hazardous Waste Management	
U		03-72-009		UIC Well #2	
U		03-72-011		UIC Well #4	
U		03-72-012		UIC Well #5	
U		03-72-013		UIC Well #6	
E		03-72-000105		Air Permits P001, T007-8, T017-20	
				T022-25, T036-41	
E		NA		USEPA TSCA Appr. Letter (9/25/95)	

EPA I.D. Number (Enter from page 1)		Secondary ID Number (Enter from page 1)	
OHD020273819			
XI. Nature of Business (Provide a brief description)			
The Vickery facility receives aqueous wastes for treatment and storage in a series of treatment and disposal tanks. These wastes are filtered, blended and disposed of through deep injection wells. A closure cell which contains the closure material from clean closed surface impoundments is located on the site.			
XII. Process Codes and Design Capacities			
<p>A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Thirteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in item XIII.</p> <p>B. PROCESS DESIGN CAPACITY - For each code entered in column A, enter the capacity of the process.</p> <p>1. AMOUNT - Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.</p> <p>2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.</p> <p>C. PROCESS TOTAL NUMBER OF UNITS - Enter the total number of units used with the corresponding process code.</p>			
PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	
D79	<u>Disposal:</u> Underground Injection	Gallons; Liters; Gallons Per Day; or Liters Per Day	
D80	Landfill	Acre-feet or Hectare-meter	
D81	Land Treatment	Acres or Hectares	
D82	Ocean Disposal	Gallons Per Day r Liters Per Day	
D83	Surface Impoundment	Gallons or Liters	
D99	Other Disposal	Any Unit of Measure Listed Below	
S01	<u>Storage:</u> Container (Barrel, Drum, Etc.)	Gallons or Liters	
S02	Tank	Gallons or Liters	
S03	Waste Pile	Cubic Yards or Cubic Meters	
S04	Surface Impoundment	Gallons or Liters	
S05	Drip Pad	Gallons or Liters	
S06	Containment Building-Storage	Cubic Yards or Cubic Meters	
S99	Other Storage	Any Unit of Measure Listed Below	
T01	<u>Treatment:</u> Tank	Gallons Per Day or Liters Per Day	
T02	Surface Impoundment	Gallons Per Day or Liters Per Day	
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; or Btu's Per Hour	
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour	
T80	Boiler	Gallons or Liters	
T81	Cement Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour	
T82	Lime Kiln	Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour	
T83	Aggregate Kiln	Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour	
T84	Phosphate Kiln	Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour	
T85	Coke Oven	Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour	
T86	Blast Furnace	Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour	
T87	Smelting, Melting, Or Refining Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour	
T88	Titanium Dioxide Chloride Process Oxidation Reactor	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour	
T89	Methane Reforming Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour	
T90	Pulping Liquor Recovery Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour	
T91	Combustion Device Used In The Recovery Of Sulfur Values From Spent Sulfuric Acid	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour	
T92	Halogen Acid Furnaces	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour	
T93	Other Industrial Furnaces Listed in 40 CFR §260.10	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour	
T94	Containment Building-Treatment	Cubic Yards or Cubic Meters	
X01	<u>Miscellaneous (Subpart X):</u> Open Burning/Open Detonation	Any Unit of Measure Listed Below	
X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; or Kilograms Per Hour	
X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour	
X04	Geologic Repository	Cubic Yards or Cubic Meters	
X99	Other Subpart X	Any Unit of Measure Listed Below	

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons.....	G	Short Tons Per Hour	D	Cubic Yards	Y
Gallons Per Hour	E	Metric Tons Per Hour	W	Cubic Meters	C
Gallons Per Day	U	Short Tons Per Day	N	Acres	B
Liters	L	Metric Tons Per Day	S	Acre-feet	A
Liters Per Hour	H	Pounds Per Hour	J	Hectares	Q
Liters Per Day	V	Kilograms Per Hour	R	Hectare-meter.....	F
				Btu's Per Hour	I

EPA I.D. Number (Enter from page 1)	Secondary ID Number (Enter from page 1)
OHD020273819	

XII. Process Codes and Design Capabilities (Continued)

EXAMPLE FOR COMPLETING ITEM XII (Shown in line number X-1 below): A facility has a storage tank, which can hold 533.788 gallons.

Line Number	A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY		C. Process Total Number Of Units	For Official Use Only			
				1. Amount (Specify)	2. Unit Of Measure (Enter code)					
X 1	S	0	2	533.788	G	001				
1	S	0	2	1097050.	G	019				
2	T	0	4	650000.	U	003				
3	T	0	1	650000.	U	019				
4	D	7	9	2400000000.	G	004				
5	D	8	3	425000.	Y	001				
6										
7										
8										
9										
10										
11										
12										
13										

NOTE: If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in item XIII.

XIII. Other Processes (Follow instructions from item XII for D99, S99, T04 and X99 process codes)

Line Number (Enter #s in seg wXII)	A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY		C. Process Total Number Of Units	D. Description Of Process
				1. Amount (Specify)	2. Unit Of Measure (Enter code)		
X 1	T	0	4				In-situ Vitrification
1							
2	T	0	4	650000.	U	003	Filtration
3							
4							

EPA I.D. Number (Enter from page 1)						Secondary ID Number (Enter from page 1)																	
OHD020273819																							
XIV. Description of Hazardous Wastes																							
<p>A. EPA HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR, Part 261 Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.</p> <p>B. ESTIMATED ANNUAL QUANTITY - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.</p> <p>C. UNIT OF MEASURE - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:</p> <table border="1" style="width:100%; border-collapse: collapse; margin-top: 10px;"> <tr> <th>ENGLISH UNIT OF MEASURE</th> <th>CODE</th> <th>METRIC UNIT OF MEASURE</th> <th>CODE</th> </tr> <tr> <td>POUNDS</td> <td>P</td> <td>KILOGRAMS</td> <td>K</td> </tr> <tr> <td>TONS</td> <td>T</td> <td>METRIC TONS</td> <td>M</td> </tr> </table> <p>If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.</p> <p>D. PROCESSES</p> <p>1. PROCESS CODES:</p> <p>For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in item XII A. on page 3 to indicate how the waste will be stored, treated, and/or disposed of at the facility.</p> <p>For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in item XII A. on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.</p> <p>NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:</p> <ol style="list-style-type: none"> Enter the first two as described above. Enter "000" in the extreme right box of item XIV-D(1). Enter in the space provided on page 7, Item XIV-E, the line number and the additional code(s). <p>2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form (D.(2)).</p> <p>NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:</p> <ol style="list-style-type: none"> Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line. Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste. <p>EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.</p>												ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE	POUNDS	P	KILOGRAMS	K	TONS	T	METRIC TONS	M
ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE																				
POUNDS	P	KILOGRAMS	K																				
TONS	T	METRIC TONS	M																				
Line Number	A. EPA HAZARD WASTE NO. (Enter code)					B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESS															
								(1) PROCESS CODES (Enter code)					(2) PROCESS DESCRIPTION (If a code is not entered in D(1))										
X 1	K	0	5	4		900	P	T	0	3	D	8	0										
X 2	D	0	0	2		400	P	T	0	3	D	8	0										
X 3	D	0	0	1		100	P	T	0	3	D	8	0										
X 4	D	0	0	2											Included With Above								

EPA I.D. Number (Enter from page 1)

Secondary ID Number (Enter from page 1)

OHD020273819

XIV. Description of Hazardous Wastes (Continued)

Line Number	A. EPA HAZARD WASTE NO. (Enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESSES										(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
				(1) PROCESS CODES (Enter code)										
	*		630,500	T										*See attached page of
2														the Part B Permit.
3														Individual waste codes
4														are not regulated
5														by the estimated
6														annual quantity but
7														are limited to an
8														overall facility
9														throughput of
1 0														630,500 tons.
1 1														Basis 126,000,000
1 2														gallons converted
1 3														to tons on a
1 4														specific gravity
1 5														of 1.2
1 6														
1 7														
1 8														
1 9														
2 0														
2 1														
2 2														
2 3														
2 4														
2 5														
2 6														
2 7														
2 8														
2 9														
3 0														
3 1														
3 2														
3 3														

IV. TOXICITY CHARACTERISTIC

A. WASTE IDENTIFICATION

Early Terminated

B. WASTE CHARACTERIZATION

Early Terminated

C. OTHER WASTE IDENTIFICATION

The Permittee may store, treat and dispose of the following wastes in tanks, filtration unit and injection wells at the facility subject to the terms of the RCRA permit.

Description of Hazardous Waste	EPA Hazardous Waste Number	Maximum Volume	Description of Units
Liquid Waste	See list below	1,102,600 gallons	Tank Storage (S02)
Liquid Waste	See list below	650,000 gallons/day	Treatment in Tanks (T01)
Liquid Waste	See list below	650,000 gallons/day	Filtration (T04)
Liquid Waste	See list below	2.4x10 ⁹	Injection Well Disposal (D79)

EPA Hazardous Waste Numbers: K140, K169, K170, K171, K172, U408

D. CONDITIONS REGARDING UNITS

1. All units described in Condition IV.A. above shall be operated in accordance with the State permit conditions and the State Underground Injection Control Permit conditions pertaining to those units.
2. The Permittee shall follow the waste analysis procedures required in 40 CFR Part 264, and as described in the Waste Analysis plan found in Attachment III.

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved, OMB No. 2050-0034 Expires XX/XX/02
GSA No. 3240-EP1-07

EPA ID Number (Enter from page 1)												Secondary ID Number (Enter from page 1)											
0	H	D	0	2	0	2	7	3	8	1	9												
XV. Map																							
<p>Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.</p>																							
XVI. Facility Drawing																							
<p>All existing facilities must include a scale drawing of the facility (See instructions for more detail).</p>																							
XVII. Photographs																							
<p>All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).</p>																							
XVIII. Certification(s)																							
<p>I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.</p>																							
Owner Signature <i>Thomas R. Koogler</i>												Date Signed Dec 28 1999											
Name and Official Title (Type or print) Thomas R. Koogler, Vice President, WMI Medical Services of Ohio, Inc.																							
Owner Signature												Date Signed											
Name and Official Title (Type or print)																							
Operator Signature												Date Signed											
Name and Official Title (Type or print)																							
Operator Signature												Date Signed											
Name and Official Title (Type or print)																							
XIX. Comments																							
<p>On 4/30/00, WMI Medical Services of Ohio, Inc. will become the new owner of the Vickery facility. The facility's name will become Vickery Environmental Inc. This restructuring will affect no change in the facility's operations or personnel.</p>																							
<p>Note: Mail completed form to the appropriate EPA Regional or State Office. (Refer to instructions for more information)</p>																							

ATTACHMENT 3

WRITTEN AGREEMENT FOR TRANSFER OF PERMIT

**ASSET CONTRIBUTION AGREEMENT AND BILL OF SALE AND AGREEMENT
REGARDING ASSUMPTION OF LIABILITIES**

THIS ASSET CONTRIBUTION AGREEMENT AND BILL OF SALE AND AGREEMENT REGARDING ASSUMPTION OF LIABILITIES (the "Agreement") is by and between Waste Management of Ohio, Inc., a Delaware corporation ("Parent"), and WMI Medical Services of Ohio, Inc., an Ohio corporation (the "Company").

W I T N E S S E T H:

WHEREAS, Parent owns 100% of the issued and outstanding capital stock of Company; and

WHEREAS, in connection with the operation of the Company, Parent has agreed to contribute, assign, convey and set over to the Company certain of its assets and businesses; and,

WHEREAS, in connection with the contribution of such assets by Parent, the Company has agreed to assume certain obligations of Parent in connection therewith.

NOW THEREFORE, in consideration of the mutual agreements set forth in this Agreement, and other good and valuable consideration, the receipt and adequacy of which are hereby acknowledged, the parties hereto agree as follows, intending to be legally bound hereby:

Section 1. Contribution and Sale by Parent. Parent hereby grants, sells, transfers, conveys, assigns and delivers to the Company, its successors and assigns, to have and to hold forever, all of Seller's right, title and interest in and to those assets and properties listed on Exhibit A hereto (collectively, the "Assets"). Such Assets are transferred and conveyed by Parent to the Company as a capital contribution. The Company hereby accepts and takes delivery of the Assets and accepts Parents' capital contribution in connection therewith.


Section 2. Assumption of Liabilities by the Company. In consideration of the Assets acquired by the Company hereunder, the Company hereby accepts, assumes and agrees to fully perform all of Parent's obligations pursuant to and in connection with the Assets.

Section 3. Further Assurances. From time to time hereafter, the parties shall each execute and deliver such additional or further instruments of conveyance, assignment and transfer, or instruments of assumption, as applicable, and take such actions as the other parties may reasonably request in order to more effectively convey and transfer the assets transferred and assigned hereunder, or as applicable, the obligations assumed hereby, all shall reasonably be necessary or appropriate in connection with carrying out the purpose of intent of this Agreement.

Section 4. Counterparts. This Agreement may be executed in counterparts, each of which when executed by the parties hereto shall be deemed an original and all of which together shall be deemed the same agreement.

IN WITNESS WHEREOF, the parties hereto have executed this Contribution Agreement and Bill of Sale and Agreement Regarding Assumption of Liabilities, effective as of April 30, 2000.

WASTE MANAGEMENT OF OHIO, INC.

By: 
Thomas Koogler, Vice President

WMI MEDICAL SERVICES OF OHIO, INC.

By: 
Thomas Koogler, Vice President

EXHIBIT A

Vickery Landfill Assets

ATTACHMENT 4

SUMMARY OF RULE REQUIREMENTS AND FACILITY RESPONSE

Summary of Rule Requirements and Facility Response

Transfer of Permit 40 CFR 270.40	Rule Requirement	Facility Response	
(b)	Class 1 Modification	See response below.	
	Revised Permit Application	See Attachment 2.	
	Written Agreement	See Attachment 3.	
	Financial Requirements	WMO's federal permit does not at this time include requirements under Subpart H of 40 CFR 264. The financial requirements are included in the facility's Ohio EPA Part B Permit and will be continuously maintained; therefore, the requirements are non-applicable to this permit modification request.	
Class 1* Modification 40 CFR 270.42(a)(1)...	Rule Requirement	Facility Response	
(i)	Notification to Director	This letter is the notification.	
(i)	Changes being made to Permit Conditions	There are no requested changes to Permit Conditions.	
(i)	Why Modification Needed	This request is necessary in order to complete the planned change of ownership in accordance with 40 CFR 270.40. The name of the corporation will be changed to Vickery Environmental, Inc. to better reflect the operations of the facility it will own. See Attachment 1 for additional information.	
(i)	Information Required by 40 CFR 270.13-270.21; 270.62; 270.63.	See information provided below.	
	40 CFR 270.13-Part A	See Attachment 2 for the Federal Part A Application.	

Summary of Rule Requirements and Facility Response

Class I* Modification 40 CFR 270.42(a)(1)...	Rule Requirement	Facility Response
(i)	40 CFR 270.14-Part B	This request is to allow the following to continue: treatment (T01) and storage (S02) in tanks, filtration (T04) and injection well disposal (D79). There are no revisions to the Part B Application. This change is purely administrative in nature and will not require any additional or different management practices. There will be no addition to or change in the treatment process. Blending of wastes will still occur in tanks. Filtration of the waste stream will occur in the existing, permitted filtration operations. All wastes will pass the currently approved Waste Analysis Plan requirements. No new fire protection is required.
(i)	40 CFR 270.15-Containers	The facility does not manage hazardous wastes in these types of units under this rule.
	40 CFR 270.17 to 40 CFR 270.21; 40 CFR 270.62 and 40 CFR 270.63 Surface Impoundments, waste piles, incinerators, land treatment.	The facility does not manage hazardous wastes in these types of units.
(i)	40 CFR 270.16-Tanks	There are no revisions to the Part B Application. This change is purely administrative in nature and will not require any additional or different management practices. There will be no addition to or change in the treatment process. Blending of wastes will still occur in tanks. Filtration of the waste stream will occur in the existing, permitted filtration operations. All wastes will pass the currently approved Waste Analysis Plan requirements. No new fire protection is required.
(ii)	Notification to Mailing List	WMO will send notification of the modification to all persons on the facility mailing list, as maintained by the Director and all appropriate State and local government. These notifications will be made within 90 days after the Director approves this request.

Summary of Rule Requirements and Facility Response

Permit Condition	Requirement	Facility Response
(D)(12)	Notify New Owner of Requirements of 40 CFR 264; 268 and 270	Since this change of ownership is purely administrative in nature, this action will not be necessary. The officers will be the same for both the old and new corporation and the personnel operating the facility will not change as a result of this change of ownership.
(D)(12)	Copy of RCRA permit to new owner	Since this change of ownership is purely administrative in nature, this action will not be necessary. The officers will be the same for both the old and new corporation and the personnel operating the facility will not change as a result of this change of ownership.

WASTE MANAGEMENT OF OHIO, INC.

3956 STATE ROUTE 412 • VICKERY, OHIO 43464 • 419-547-7791 • FAX: 419-547-6144

November 19, 1999

Re: Waste Management of Ohio, Inc. Vickery, Ohio Facility
OHD 020 273 819
RCRA Class 1 Permit Modifications

Dear Citizen:

Your name is on the "facility mailing list" for Waste Management of Ohio, Inc. (WMO) Vickery facility. As required by 40 CFR 270.42(a)(1)(ii), WMO is informing you of the following Class 1 Modifications for its Federal Hazardous Waste Management Permit issued October 24, 1994.

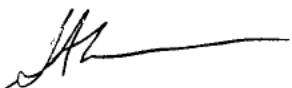
1. On November 12, 1999, WMO received approval of it's modification request for early termination of certain sections of it's US EPA Federal Hazardous Waste Management Permit. These sections are either redundant with WMO's existing State RCRA permit or are no longer applicable to the current operations of the facility.

As required by OAC 3745-50-51(D)(1)(a)(ii), WMO is informing you of the following Class 1 Modifications for its Ohio Hazardous Waste Management Permit issued October 24, 1994.

1. On August 26, 1999, WMO implemented a Class 1 modification which included the addition of process codes for waste codes D001 and D003, updating it's Emergency Coordinator listing and other administrative changes to the facility's Contingency Plan, and updating the Organization Chart for the facility's Training Plan.
2. On October 15, 1999, WMO implemented a Class 1 modification which included the installation of a third pump for direct unloading and the replacement of approximately 590 feet of fibercast piping with PVC piping from unloading to tank T-10.
3. On November 8, 1999, WMO implemented a Class 1 modification to update it's Emergency Coordinator listing in it's Contingency Plan.

Sincerely,

WASTE MANAGEMENT OF OHIO, INC.



Stephen C. Lonneman
General Manager



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

November 5, 1999

REPLY TO THE ATTENTION OF
DW-8J

CERTIFIED MAIL: P 140 678 625
RETURN RECEIPT REQUESTED

Mr. Stephen C. Lonneman
General Manager
Waste Management of Ohio, Inc.
3956 State Route 412
Vickery, Ohio 43464

**RE: Waste Management of Ohio, Inc.
Class 1 Federal Resource Conservation and Recovery Act
RCRA) Permit Modification to Early Terminate of Portions of
the Federal RCRA Permit
OHD 020 273 819**

Dear Mr. Lonneman:

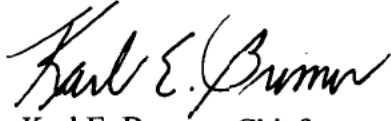
The United States Environmental Protection Agency (U.S. EPA) has completed its review of the Waste Management of Ohio, Inc.'s (WMO) Class 1 Federal RCRA permit modification, dated August 19, 1999. WMO requested early termination of specific portions of its Federal RCRA permit, originally issued on October 24, 1994. The specific portions WMO requested early termination are either redundant with WMO's existing State RCRA permit or no longer applicable to the current operations of the facility.

Based on its review, the U.S. EPA approves WMO's Class 1 Federal RCRA permit modification request. The U.S. EPA has early terminated the text in sections IV.A. and IV.B. of the Federal RCRA permit and have modified the text in Section IV.C. The modification of the text in Section IV.C. resulted in removing waste codes from this section that have been included in WMO's State RCRA permit and retaining only those waste codes not promulgated by the State of Ohio. In addition, pursuant to WMO's request, the reference to "Container Storage" has been terminated from this Section. Section I.D.17. of the permit has been updated with the current mailing information.

WMO shall replace its Federal RCRA permit, starting with the "PERMIT INDEX" page through page 18 of 18, with the enclosed replacement pages. All "ATTACHMENTS" to the Federal RCRA permit are unchanged and remain a portion of the revised Federal RCRA permit, even though not provided with the enclosed replacement pages.

If you have any questions, please contact Thomas Matheson at (312) 886-7569.

Sincerely,

A handwritten signature in black ink, appearing to read "Karl E. Bremer". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Karl E. Bremer, Chief
Waste Management Branch

Enclosure

cc: Chuck Hull, OEPA/NWDO
Ed Lim, OEPA/CO

If you have any questions, please contact Thomas Matheson at (312) 886-7569.

Sincerely,

Karl E. Bremer, Chief
Waste Management Branch

Enclosure

cc: Chuck Hull, OEPA/NWDO
Ed Lim, OEPA/CO

DW-8J:MATHESON:twm:6-7569:11/5/1999:File F:\user\tmatheso\Class 1 Early Termination ok.wpd

WASTE MANAGEMENT BRANCH

SECRETARY	SECRETARY	SECRETARY	SECRETARY	SECRETARY
				<i>LW 11/5/99</i>
TYPIST/ AUTHOR	IL/IN/MI SECTION CHIEF	MN/OH/WI SECTION CHIEF	POL.PREV.& SPEC.INTIV SEC. CHIEF	WMB BRANCH CHIEF
<i>Jim</i> <i>11/05/1999</i>				<i>KES</i> <i>11/5/99</i>

Waste Management of Ohio, Inc. Vickery
OHD 020 273 819
November 5, 1999

PERMIT INDEX

PERMIT CONDITIONS:

	<u>PAGE</u>
I. Standard Conditions	1
II. Land Disposal Requirements	7
III. Corrective Action Requirements	9
IV. Toxicity Characteristic	16
V. Air Emission Standards	17
VI. Schedule of Compliance	18

ATTACHMENTS:

- I. List of Solid Waste Management Units
- II. RCRA Corrective Action Scope of Work
- III. Waste Analysis Plan

P 140 678 625

US Postal Service
Receipt for Certified Mail

Waste Management of Ohio, Inc.
Stephen C. Lonneman, General Manager
3956 State Rte. 412
Vickery, OH 43464

T. Mathewson
DRF-85

Postage	\$ 1.21
Certified Fee	1.40
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	1.25
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$ 3.86
Postmark or Date	P140 678 625

PS Form 3800, April 1995

PERMIT CONDITIONS

(Note: The regulatory citations in parentheses are incorporated by reference.)

I. STANDARD CONDITIONS

A. EFFECT OF PERMIT (40 CFR 270.4 and 270.30(g))

The Permittee is allowed to manage hazardous waste in accordance with the conditions of the RCRA permit. Any management of hazardous waste not authorized in the RCRA permit is prohibited.

Compliance with the RCRA permit during its term constitutes compliance, for the purposes of enforcement, with Subtitle C of RCRA, except for those requirements not included in the permit which become effective by statute, or which are promulgated under 40 CFR Part 268, restricting the placement of hazardous waste in or on the land. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under Sections 3008(a), 3008(h), 3013, or 7003 of RCRA; Sections 104, 106(a), or 107 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended (42 U.S.C. §9601 et seq., commonly known as CERCLA); or any other law providing for protection of public health or the environment.

B. PERMIT ACTIONS (40 CFR 270.30(f))

This permit may be modified, revoked and reissued, or terminated for cause as specified in 40 CFR 270.41, 270.42, and 270.43. This permit may also be reviewed and modified by the U.S. EPA, consistent with 40 CFR 270.41, to include any terms and conditions determined necessary to protect human health and the environment pursuant to Section 3005(c)(3) of RCRA. The filing of a request for a permit modification, revocation and reissuance, or termination, or the notification of planned changes, or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition. The Permittee shall not perform any construction associated with a Class 3 permit modification request until such modification request is granted and the modification becomes effective.

C. SEVERABILITY (40 CFR 124.16)

The provisions of this permit are severable, and if any provision of this permit, or if the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

D. DUTIES AND REQUIREMENTS

1. Duty to Comply. (40 CFR 270.30(a))

The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance is authorized by an emergency permit (See 40 CFR 270.61). Any permit noncompliance, other than noncompliance authorized by an emergency permit, constitutes a violation of RCRA and HSWA and is grounds for enforcement action, permit termination, revocation and reissuance, modification, denial of a permit renewal application, or other appropriate action.

2. Duty to Reapply. (40 CFR 270.30(b) and 270.10(h))

The Permittee shall submit a complete application for a new permit at least 180 days before this permit expires unless: a) the Permittee no longer wishes to operate a hazardous waste management facility; b) the Permittee is no longer required to have a RCRA permit; or c) permission for a later date has been granted by the Regional Administrator. The Regional Administrator shall not grant permission for applications to be submitted later than the expiration date of the existing permit.

3. Permit Expiration. (40 CFR 270.13, 270.14, 270.50, and 270.51)

This permit and all conditions herein shall be effective for a fixed term not to exceed 10 years, and will remain in effect beyond the permit's expiration date only if the Permittee has submitted a timely, complete application (per 40 CFR 270.10 and applicable sections of 270.14 through 270.29): a) to both the U.S. EPA and the State; and b) through no fault of the Permittee, the Regional Administrator and the State have not issued a new permit, as set forth in 40 CFR 270.51.

4. Need to Halt or Reduce Activity Not a Defense. (40 CFR 270.30(c))

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

5. Duty to Mitigate. (40 CFR 270.30(d))

In the event of releases or noncompliance with the permit, the Permittee shall take all reasonable steps to minimize releases to the environment and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health and the environment.

6. Proper Operation and Maintenance. (40 CFR 270.30(e))

The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality control/quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit.

7. Duty to Provide Information. (40 CFR 270.30(h) and 264.74)

The Permittee shall furnish to the Regional Administrator, within the time designated by the Regional Administrator, any relevant information which the Regional Administrator may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Regional Administrator, upon request, copies of records required to be kept by this permit.

8. Inspection and Entry. (40 CFR 270.30(i))

The Permittee shall allow the Regional Administrator, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:

- a. Enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
- d. Sample or monitor, at reasonable times, for the purposes of assuring permit compliance, or as otherwise authorized by RCRA, any substances or parameters at any location.

9. Monitoring and Recordkeeping. (40 CFR 270.30(j), 270.31, 264.73, and 264.74)

The Permittee shall retain all reports, records, or other documents, required by this permit, and records of all data used to complete the application for this permit, for a period of at least 3 years from the date of the reports, records or other documents. Corrective Action records

must be maintained at least 3 years after all Corrective Action activities have been completed. These periods may be extended by request of the Regional Administrator at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility.

10. Reporting Planned Changes. (40 CFR 270.30(l)(1))

The Permittee shall give notice to the Regional Administrator of any planned physical alterations or additions to the permitted facility, as soon as possible, and at least 30 days before construction of such alteration or addition is commenced.

11. Anticipated Noncompliance. (40 CFR 270.30(l)(2))

The Permittee shall give advance notice to the Regional Administrator of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements. Such notice does not constitute a waiver of the Permittee's duty to comply with permit requirements.

12. Transfer of Permits. (40 CFR 270.30(l)(3), 270.40(a), and 264.12(c))

This permit may be transferred by the Permittee to a new owner or operator only after providing notice to the Regional Administrator and only if the permit is modified, or revoked and reissued, pursuant to 40 CFR 270.40(b), 270.41(b)(2), or 270.42(a). Before transferring ownership or operation of the facility during its operating life, the Permittee shall notify the new owner or operator in writing of the requirements of 40 CFR Parts 264, 268, and 270 (including all applicable corrective action requirements), and shall provide a copy of the RCRA permit to the new owner or operator.

13. Compliance Schedules. (40 CFR 270.30(l)(5) and 270.33)

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted to the Regional Administrator no later than 14 days following each scheduled date.

14. Twenty-four Hour Reporting. (40 CFR 270.30(l)(6) and 270.33)

The Permittee shall report to the Regional Administrator any noncompliance with this permit which may endanger human health or the environment. Any such information shall be reported orally within 24 hours from the time the Permittee becomes aware of the circumstances. This report shall include the following:

- a. Information concerning the release of any hazardous waste which may endanger public drinking water supplies; and

b. Information concerning the release or discharge of any hazardous waste, or of a fire or explosion at the facility, which could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:

- (1) Name, address, and telephone number of the owner or operator;
- (2) Name, address, and telephone number of the facility;
- (3) Date, time, and type of incident;
- (4) Name and quantity of material(s) involved;
- (5) The extent of injuries, if any;
- (6) An assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and
- (7) Estimated quantity and disposition of recovered material that resulted from the incident.

A written submission shall also be provided within 5 days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period(s) of noncompliance (including exact dates and times); steps taken to minimize impact on the environment; whether the noncompliance has been corrected, and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate and prevent recurrence of the noncompliance. The Permittee need not comply with the 5-day written notice requirement if the Regional Administrator waives the requirement. Upon waiver of the 5-day requirement, the Permittee shall submit a written report within 15 days of the time the Permittee becomes aware of the circumstances.

15. Other Noncompliance. (40 CFR 270.30(l)(10))

The Permittee shall report all other instances of noncompliance not otherwise required to be reported above within 15 days of when the Permittee becomes aware of the noncompliance. The reports shall contain the information listed in Condition I.D.14.

16. Other Information. (40 CFR 270.30(l)(11))

Whenever the Permittee becomes aware that it failed to submit any relevant facts, or submitted incorrect information to the Regional Administrator in the permit application or in any reports, records, or other documentation provided to the Regional Administrator, the Permittee shall promptly submit such facts or information.

17. Submittal of Reports or Other Information. (40 CFR 270.30(l)(7), (8), and (9), and 270.31)

All reports or other information required to be submitted pursuant to this permit shall be sent to:

**Waste Management Branch, DRP-8J
Waste, Pesticides and Toxics Division
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604**

Attention: **Technical Support and Permitting Section**

18. All other requirements contained in RCRA, as amended, and in 40 CFR 270.30 not set forth herein are hereby fully incorporated in this permit.

E. SIGNATORY REQUIREMENT (40 CFR 270.30(k))

All reports or other information submitted to or requested by the Regional Administrator, his designee, or authorized representative, shall be signed and certified as required by 40 CFR 270.11.

F. CONFIDENTIAL INFORMATION

In accordance with 40 CFR 270.12 and 40 CFR Part 2, Subpart B, any information submitted to the U.S. EPA pursuant to this permit may be claimed as confidential by the submitter. Any such claim must be asserted at the time of submission in the manner prescribed on the application form or instructions, or, in the case of other submissions, by marking the words "Confidential Business Information" on each page containing such information.

If no claim is made at time of submission, the U.S. EPA may make the information available to the public without further notice. If a claim is asserted, the information will be treated in accordance with the procedures in 40 CFR Part 2.

G. DOCUMENTS TO BE MAINTAINED AT THE FACILITY

The Permittee shall maintain at the facility, until closure is completed and certified by an independent registered professional engineer, all items required by 40 CFR 264.73, including the following documents and all amendments, revisions, and modifications to these documents:

1. Waste Analysis Plan, as required by 40 CFR 264.13 and this permit;
2. Operating Record, as required by 40 CFR 264.73 and this permit;

3. Notifications from generators accompanying each incoming shipment of wastes subject to 40 CFR Part 268, Subtitle C, that specify treatment standards as required by 40 CFR 264.73, 268.7, and this permit;
4. Corrective Action reports and records as required by Conditions III.F. and VI. of this permit. These reports and records must be maintained for at least 3 years after all Corrective Action Activities have been completed.
5. Records regarding closed-vent systems and control devices and/or equipment leaks as required by 40 CFR 264.1035, 264.1064, and 264.73, and Condition V.C. of this permit.

II. LAND DISPOSAL REQUIREMENTS

A. GENERAL CONDITIONS

1. The Permittee shall comply with all the applicable self-implementing requirements of 40 CFR Part 268 and all applicable land disposal requirements which become effective by statute (Section 3004 of RCRA).
2. A mixture of any restricted waste with nonrestricted waste(s) is a restricted waste under 40 CFR Part 268.
3. The Permittee shall not in any way dilute a restricted waste or the residual from treatment of a restricted waste as a substitute for adequate treatment to achieve compliance with 40 CFR Part 268, Subpart D, to circumvent the effective date of a prohibition in 40 CFR Part 268, Subpart C, to otherwise avoid a prohibition in 40 CFR Part 268, Subpart C, or to circumvent a land disposal prohibition imposed by Section 3004 of RCRA.
4. The Permittee shall prepare and maintain a current list of the hazardous waste codes handled by the facility that are identified in 40 CFR 268, Subparts B and C. The list shall include all waste codes handled by the facility, and any associated treatment standards, and shall be updated through the inclusion of new treatment standards, as promulgated or amended. This list shall be provided to the U.S. EPA representatives, or their designees, upon request.

B. TESTING AND RELATED REQUIREMENTS

1. The Permittee must test, in accordance with 40 CFR 268.7(a), any waste generated at the facility, or use knowledge of the waste, to determine if the waste is restricted from land disposal.
2. For restricted wastes with treatment standards expressed as concentrations in the waste extract, as specified in 40 CFR 268.41, the Permittee shall test the wastes or waste treatment residues, or extracts of such residues developed using the test methods described in Appendix

II of 40 CFR Part 261 (Toxicity Characteristic Leaching Procedure, or TCLP) to assure that the wastes or waste treatment residues or extracts meet the applicable treatment standards of 40 CFR Part 268, Subpart D. Such testing shall be performed as required by 40 CFR 264.13.

3. A restricted waste for which a treatment technology is specified under 40 CFR 268.42(a) may be land disposed after it is treated using that specified technology or an equivalent treatment method approved by the Administrator under the procedures set forth in 40 CFR 268.42(b).
4. For restricted wastes with treatment standards expressed as concentrations in the waste, as specified in 40 CFR 268.43, the Permittee shall test the wastes or waste treatment residues (not extracts of such residues) to assure that the waste or waste treatment residues meet the applicable treatment standards of 40 CFR Part 268, Subpart D. Such testing shall be performed as required by 40 CFR 264.13.
5. The Permittee shall comply with all the applicable notification, certification, and recordkeeping requirements described in 40 CFR 268.7(a) and (b).

C. STORAGE PROHIBITIONS

1. The Permittee shall comply with all the applicable prohibitions on storage of restricted wastes specified in 40 CFR Part 268, Subpart E.
2. Except as otherwise provided in 40 CFR 268.50, the Permittee may store restricted wastes in tanks and containers solely for the purpose of the accumulation of such quantities of hazardous wastes as necessary to facilitate proper recovery, treatment, or disposal provided that:
 - a. Each container is clearly marked to identify its contents and the date each period of accumulation begins; and
 - b. Each tank is clearly marked with a description of its contents, the quantity of each hazardous waste received, and the date each period of accumulation begins, or such information for each tank is recorded and maintained in the operating record at that facility.
3. The Permittee may store restricted wastes for up to 1 year unless the U.S. EPA or its authorized agent can demonstrate that such storage was not solely for the purpose of accumulating such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment or disposal.
4. The Permittee may store restricted wastes beyond 1 year; however, the Permittee bears the burden of proving that such storage was solely for the purpose of accumulating such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment or disposal.

5. The Permittee shall not store any liquid hazardous waste containing polychlorinated biphenyls (PCBs) at concentrations greater than or equal to 50 ppm unless the waste is stored in a storage facility that meets the requirements of 40 CFR 761.65(b). This waste must be removed from storage and treated or disposed as required by 40 CFR Part 268 within 1 year of the date when such wastes are first put into storage. Condition II.C.4. above, that allows storage for over 1 year with specified demonstration, does not apply to PCB wastes prohibited under 40 CFR 268.32.

III. CORRECTIVE ACTION REQUIREMENTS

A. CORRECTIVE ACTION AT THE FACILITY

In accordance with Section 3004(u) of RCRA and the regulations promulgated pursuant thereto, the Permittee must institute Corrective Action as necessary to protect human health and the environment for all releases of hazardous waste(s) or hazardous constituent(s) from any solid waste management units (SWMUs) at the facility, regardless of the time at which waste was placed in such units.

B. CORRECTIVE ACTION BEYOND THE FACILITY BOUNDARY

In accordance with Section 3004(v) of RCRA and the regulations promulgated pursuant thereto, the Permittee must implement Corrective Action(s) beyond the facility property boundary, where necessary to protect human health and the environment, unless the Permittee demonstrates to the satisfaction of the Regional Administrator that, despite the Permittee's best efforts, the Permittee was unable to obtain the necessary permission to undertake such actions. The Permittee is not relieved of all responsibility to clean up a release that has migrated beyond the facility boundary where off-site access is denied. On-site measures to address such releases will be addressed under the RCRA Facility Investigation, Corrective Measures Study, and Corrective Measures Implementation phases, as determined to be necessary on a case-by-case basis.

C. IDENTIFICATION OF SWMUs

During the Spring of 1990, Jacobs Engineering Group Inc. (Jacobs), was subcontracted by the U.S. EPA through Metcalf & Eddy to perform a RCRA Facility Assessment (RFA) at the Chemical Waste Management Inc., Vickery facility (CWM) located at 3956 State Route 412, Vickery, Ohio 43464. Jacobs conducted a Visual Site Inspection (VSI) at the facility on May 8 and 9, 1990, to verify the condition of these units and to identify Solid Waste Management Units (SWMU) and Areas of Concern (AOC) that were not found during the Preliminary Review. At the end of the VSI, 45 SWMUs and 5 AOCs were identified. A detailed description of each SWMU and AOC is presented in Section V of the VSI report, with additional comments in the RFA report. A list of SWMUs and AOCs is presented in Attachment I. There is sufficient evidence of past and potential releases to warrant the implementation of Corrective Action at the CWM facility in Vickery, Ohio. A RCRA Facility Investigation will be performed at this

facility, investigating all environmental media, in light of the historical lack of secondary containment for some units, contaminated soils and documented releases of contaminants to the environment.

CWM currently operates as a treatment, storage, and disposal facility for liquid hazardous wastes. The wastes are stored and treated in above ground tanks, filtered, blended, and disposed of by deep well injection through four Class 1 injection wells. The injection wells are regulated under a separate authority, however they will be addressed under Corrective Action through this RCRA permit. The Class 1 underground injection wells on-site, including all former and closed wells and the ones currently in use, are SWMUs (46-52) and should be assessed during the RFI.

SWMUs 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, and 11 have potential for releases that are considered high because the surface impoundments are unlined, and there are documented instances of releases to soils from transfer pipes and broken dikes. Sampling of soils and sludges has indicated the presence of PCBs, VOCs, and metals in some units. While these units are currently undergoing closure or are awaiting certification of closure, Corrective Action is still necessary.

For SWMUs 12, 13, 14, 15, 16, 17, 18, 19, 20, 27, 28, 29, 30, 31, 32, 33, 34, 37, and AOC D, there is a high potential for releases due to previous operation without secondary containment, documented spills, or documented soil contamination.

For SWMUs 19, 34, 35, 36, 37, 38, 39, 40, 42, 43, 44, 45 and AOCs A, B, C, E, there is no actual evidence of release to any particular environmental media, but soil, water, sediments, and air sampling may be required, based on information gathered at the facility, for those aforementioned units whose structural integrity is uncertain.

Several large releases of liquid hazardous waste to both Little Raccoon Creek and Meyer's Creek have been documented. Due to the nature of the wastes, predominantly acids, detection of historic releases to surface water should be made by analyzing sediments. Therefore an assessment of surface water sediments should be performed on-site for Little Raccoon Creek, Meyers Creek, any known ephemeral streams, and any other bodies of surface water.

In summary, all of the SWMUs and AOCs at the facility shall be included in the RFI. The media to be investigated in the RFI include: surface water, ground water, soil, sediments, and air. However, sampling of all media for all SWMUs is not required at this time.

D. NEWLY IDENTIFIED SWMUs OR RELEASES

1. General Information

The Permittee shall notify the Regional Administrator, within 30 days of discovery, of the following information requirements for any new SWMU identified at the facility, in accordance with 40 CFR 270.14(d):

- a. The location of the unit on the site topographic map;
- b. Designation of the type of unit;
- c. General dimensions and structural description (supply any available drawings);
- d. When the unit was operated; and
- e. Specifications of all waste(s) that have been managed at the unit.

2. Release Information

The Permittee must submit to the Regional Administrator, within 30 days of discovery, all available information pertaining to any release of hazardous waste(s) or hazardous constituent(s) from any new or existing SWMU.

E. CORRECTIVE ACTION FOR NEWLY IDENTIFIED SWMUs AND RELEASES

The Regional Administrator will review the information provided in Condition III.D. above, and may as necessary require further investigations or corrective measures. The Permittee shall submit a written RCRA Facility Investigation Workplan to the Regional Administrator within thirty (30) days after written notification by the Regional Administrator that further investigation is necessary.

F. CORRECTIVE ACTION ACTIVITIES

1. RCRA Facility Investigation (RFI)

The Permittee shall conduct an RFI to evaluate thoroughly the nature and extent of the release of hazardous waste(s) and hazardous constituent(s) from all applicable SWMUs and AOCs identified in Condition III.C. above. The major tasks and required submittal dates are shown below. Additional tasks and associated submittal dates may also be specified in the Schedule of Compliance (Permit Condition VI.). The scope of work for each of the tasks is found in Attachment II (RCRA Corrective Action Plan).

a. RFI Workplan

The Permittee shall submit a written RFI Workplan to the Regional Administrator within one hundred and eighty (180) days after the effective date of this permit.

The Regional Administrator will approve, modify and approve, or disapprove, and provide comments on the Workplan in writing to the Permittee. Within thirty (30) days of receipt of such comments, the Permittee must modify the Workplan, so as to reflect the changes

required in the Regional Administrator's comments, or submit a new workplan for the Regional Administrator's approval. The RFI Workplan, as approved or as modified and approved, becomes an enforceable condition of this permit.

b. RFI Implementation

Within thirty (30) days of the Regional Administrator's written approval of the RFI Workplan, the Permittee shall implement the RFI Workplan according to the terms and schedule in the approved RFI Workplan.

c. RFI Final Report

Within sixty (60) days after the completion of the RFI, the Permittee shall submit an RFI Final Report to the Regional Administrator. The RFI Final Report shall describe the procedures, methods, and results of the RFI. The Final Report must contain adequate information to support further corrective action decisions at the facility.

After the Permittee submits the RFI Final Report, the Regional Administrator shall either approve or disapprove the Report in writing. If the Regional Administrator disapproves the Report, the Regional Administrator shall notify the Permittee in writing of the deficiencies and specify a due date for submittal of a revised Report. The RFI Final Report, as approved, becomes an enforceable condition of this permit.

2. Interim Measures

The following specific interim measures have been identified by the Regional Administrator:

Within sixty (60) calendar days after the effective date of this permit, CWM will submit to the U.S. EPA a report on the current conditions of the Vickery facility. The format of the report should follow that of Section I.A.1 of the Corrective Action Scope of Work found in Attachment II. In addition the report should include a comprehensive section on contamination of all environmental media, using all previous data.

Within 30 calendar days after the submission of the report on current conditions, CWM will schedule a meeting with the U.S. EPA. The meeting will be held to discuss the current conditions report, specific objectives of the RFI, and content requirements for the RFI's Quality Assurance Project Plan.

3. Determination of No Further Action

a. Permit Modification

After completion of and based on the results of the RFI and other relevant information, the Permittee may submit an application to the Regional Administrator for a Class 3 permit modification under 40 CFR 270.42(c) to terminate the Corrective Action tasks of the Schedule of Compliance. Other tasks identified in the Schedule of Compliance shall remain in effect. This permit modification must conclusively demonstrate that there are no releases of hazardous waste(s), including hazardous constituents, from SWMUs at the facility that pose a threat to human health and the environment.

If, based upon review of the Permittee's request for a permit modification, the results of the completed RFI, and other information, including comments received during the 60-day public comment period required for Class 3 permit modifications, the Regional Administrator determines that releases or suspected releases which were investigated either are nonexistent or do not pose a threat to human health and the environment, the Regional Administrator will grant the requested modification.

b. Periodic Monitoring

A determination of no further action shall not preclude the Regional Administrator from requiring continued or periodic monitoring of air, soil, ground water, or surface water, if necessary to protect human health and the environment, when site-specific circumstances indicate that potential or actual releases of hazardous waste(s) including hazardous constituents are likely to occur.

c. Further Investigations

A determination of no further action shall not preclude the Regional Administrator from requiring further investigations, studies, or remediation at a later date, if new information or subsequent analysis indicates that a release or likelihood of a release from a SWMU at the facility is likely to pose a threat to human health or the environment. In such a case, the Regional Administrator shall initiate a modification to the Corrective Action Schedule of Compliance to rescind the determination made in accordance with Permit Condition III.F.3.a. Additionally, the Regional Administrator may determine that there is insufficient information on which to base a determination, and may require the Permittee to perform additional investigations as needed to generate the needed information.

4. Corrective Measures Study (CMS)

If the Regional Administrator determines, based on the results of the RFI and other relevant information, that corrective measures are necessary, the Regional Administrator will notify

the Permittee in writing that the Permittee shall conduct a CMS. The purpose of the CMS will be to develop and evaluate the corrective action alternative(s) and to outline one or more alternative corrective measure(s) which will satisfy the performance objectives specified by the Regional Administrator. The major tasks and required submittal dates are shown below. Additional tasks and associated submittal dates may also be specified in the Schedule of Compliance (Permit Condition VI.). The Scope of Work for each of the tasks is found in Attachment II.

a. CMS Workplan

The Permittee shall submit a written CMS Workplan to the Regional Administrator within forty-five (45) days from the notification of the requirement to conduct a CMS.

The Regional Administrator will approve, modify and approve, or disapprove and provide comments on the CMS Workplan in writing to the Permittee. Within thirty (30) days of receipt of such comments, the Permittee must modify the Workplan, so as to reflect the changes required in the Regional Administrator's comments, or submit a new plan for the Regional Administrator's approval. The CMS Workplan, as approved or as modified and approved, becomes an enforceable condition of this permit.

b. CMS Workplan Implementation

Within thirty (30) days of the Regional Administrator's written approval of the CMS Workplan, the Permittee shall implement the CMS Workplan according to the terms and schedule in the approved CMS Workplan.

c. CMS Final Report

Within sixty (60) days after the completion of the CMS, the Permittee shall submit a CMS Final Report to the Regional Administrator. The CMS Final Report shall summarize the results of the investigations for each remedy studied and must include an evaluation of each remedial alternative.

After the Permittee submits the CMS Final Report, the Regional Administrator shall either approve or disapprove the Report in writing. If the Regional Administrator disapproves the Report, the Regional Administrator shall notify the Permittee in writing of the deficiencies and specify a due date for submittal of a revised Report. The CMS Final Report, as approved, becomes an enforceable condition of this permit.

5. Corrective Measures Implementation (CMI)

Based on the results of the CMS, the Regional Administrator shall select one or more of the Corrective Measures in the CMS, and shall notify the Permittee in writing of the decision. The Regional Administrator's selection will be based on the corrective measures' long-term

reliability and effectiveness, short-term effectiveness, implementability, cost, reduction of toxicity, mobility, or volume.

a. Permit Modification

The Regional Administrator will initiate a major permit modification, as provided by 40 CFR 270.41, to require implementation of the corrective measure(s) selected.

b. Financial Assurance

As part of the permit modification of this permit to incorporate CMI, the Permittee shall provide financial assurance in the amount specified by the Regional Administrator for necessary corrective action activities as required by 40 CFR 264.101(b) and (c).

G. DISPUTE RESOLUTION

1. If the Permittee disagrees, in whole or in part, with the U.S. EPA'S disapproval or modification of any submission required by Condition III.F. of the permit, the Permittee shall notify the U.S. EPA of its objections by providing the Region 5 Associate Division Director, Waste Management Division, Office of RCRA, with a written statement of position within 14 days of receipt of the U.S. EPA's disapproval or modification. The Permittee's statement of position shall set forth the specific matters in dispute, the position that the Permittee asserts should be adopted as consistent with the requirements of this permit, the basis for the Permittee's position, and shall include any supporting documentation.
2. The U.S. EPA and the Permittee shall have an additional 14 days from the U.S. EPA's receipt of the Permittee's statement of position to meet or confer to attempt to resolve the dispute. If agreement is reached, the Permittee shall submit a revised submission, if necessary, and shall implement the submission in accordance with such agreement.
3. If the U.S. EPA and the Permittee are not able to reach agreement within the 14-day period, the Regional Administrator, Region 5, or his or her delegate will thereafter issue a written decision resolving the dispute which shall become an enforceable condition of this permit, and the Permittee shall comply with the terms and conditions of the U.S. EPA's decision resolving the dispute.
4. Notwithstanding the invocation of this dispute resolution procedure, the Permittee shall proceed to take any action required by those portions of the modified and approved submission that the U.S. EPA determines are not substantially affected by the dispute according to the schedule contained in the submission.

IV. TOXICITY CHARACTERISTIC

A. WASTE IDENTIFICATION

Early Terminated

B. WASTE CHARACTERIZATION

Early Terminated

C. OTHER WASTE IDENTIFICATION

The Permittee may store, treat and dispose of the following wastes in tanks, filtration unit and injection wells at the facility subject to the terms of the RCRA permit.

Description of Hazardous Waste	EPA Hazardous Waste Number	Maximum Volume	Description of Units
Liquid Waste	See list below	1,102,600 gallons	Tank Storage (S02)
Liquid Waste	See list below	650,000 gallons/day	Treatment in Tanks (T01)
Liquid Waste	See list below	650,000 gallons/day	Filtration (T04)
Liquid Waste	See list below	2.4x10 ⁹	Injection Well Disposal (D79)

EPA Hazardous Waste Numbers: K140, K169, K170, K171, K172, U408

D. CONDITIONS REGARDING UNITS

1. All units described in Condition IV.A. above shall be operated in accordance with the State permit conditions and the State Underground Injection Control Permit conditions pertaining to those units.
2. The Permittee shall follow the waste analysis procedures required in 40 CFR Part 264, and as described in the Waste Analysis plan found in Attachment III.

V. AIR EMISSION STANDARDS

A. PROCESS VENTS

The Permittee shall comply with all applicable requirements of 40 CFR Part 264, Subpart AA, regarding air emission standards for process vents.

B. EQUIPMENT LEAKS

The Permittee shall comply with all applicable requirements of 40 CFR Part 264, Subpart BB, regarding air emission standards for equipment leaks.

C. RECORDKEEPING

The Permittee shall comply with all applicable recordkeeping and reporting requirements described in 40 CFR 264.1035, 264.1036, 264.1064, and 264.1065.

D. NOTIFICATION OF REGULATED ACTIVITY

The Permittee shall notify the Regional Administrator of any waste management units which become subject to the requirements of 40 CFR Part 264, Subparts AA and BB, within 30 days of startup of the regulated activity.

E. DUTY TO COMPLY WITH FUTURE REQUIREMENTS

The Permittee shall comply with all self-implementing provisions of any future air regulations promulgated under the provisions of Section 3004(n) of RCRA, as amended by HSWA.

VI. SCHEDULE OF COMPLIANCE

FACILITY SUBMISSION SUMMARY

Below is a summary of the planned reporting and implementation requirements pursuant to this Schedule to Compliance.

<u>Facility Submission Requirements</u>	<u>Due Date</u>
Notification of newly-identified SWMUs.	Thirty (30) calendar days after discovery.
Notification of newly-discovered releases.	Thirty (30) calendar days after discovery.
Notification of waste management units subject to the requirements of 40 CFR Part 264, Subparts AA and BB.	Thirty (30) days after startup of the activity.
Progress reports on all activities.	Monthly, no later than thirty (30) calendar days after Permittee is required to begin implementation.
Report on current conditions	Within sixty (60) calendar days of the effective date of the permit.
 <u>Facility Submission Requirements</u>	 <u>Due Date</u>
Schedule a meeting with U.S. EPA	Within <u>30 calendar days after the submission of the report on current conditions</u> , CWM will schedule a meeting with the U.S. EPA. The meeting will be held to discuss the current conditions report, specific objectives of the RFI, and content requirements for the RFI's Quality Assurance Project Plan.
RFI Workplan	Within one hundred and eighty (180) calendar days after the effective date of the permit.
RFI Workplan Implementation	Within thirty (30) calendar days of written approval of the RFI Workplan.
RFI Report and Summary Report	Within sixty (60) calendar days after completion of RFI.
CMS Workplan	Within forty-five (45) calendar days after notification of requirement to perform CMS.
CMS Workplan Implementation	Within thirty (30) calendar days of written approval of the CMS Workplan.
CMS Final Report	Within sixty (60) calendar days after completion of CMS.
Demonstration of Financial Assurance	Within one hundred twenty (120) calendar days after permit modification for remedy.

WASTE MANAGEMENT OF OHIO, INC.

3956 STATE ROUTE 412 • VICKERY, OHIO 43464 • 419-547-7791 • FAX: 419-547-6144

May 5, 1999

Re: Waste Management of Ohio, Inc. Vickery, Ohio Facility
OHD 020 273 819
RCRA Class 1 Permit Modifications

Dear Citizen:

Your name is on the "facility mailing list" for Waste Management of Ohio, Inc. (WMO) Vickery facility. As required by 40 CFR 270.42(a)(1)(ii), WMO is informing you of the following Class 1 Modifications for its Federal Hazardous Waste Management Permit issued October 24, 1994.

1. On February 10, 1999, WMO received approval of it's modification request to add certain waste codes, K140, U408, K169, K170, K171, and K172 to it's US EPA Federal Hazardous Waste Management Permit.

As required by OAC 3745-50-51(D)(1)(a)(ii), WMO is informing you of the following Class 1 Modifications for its Ohio Hazardous Waste Management Permit issued October 24, 1994.

1. On February 11, 1999, WMO implemented a Class 1 modification which included changes to Section E and related Appendices and Section J of it's Application. In summary, the changes to Section E included administrative changes, incorporating current data, updating information to reflect current hydrogeologic conditions, and the removal of appendices which included references and data that were previously submitted under separate cover. Section J was updated to include information on the current status of the corrective action program and to reference the plans and approval dates.
2. On February 11, 1999, WMO submitted a Class 1 modification request that required the Director's approval. The approval was received on April 16, 1999. The request was to lower the prediction limits based on the results of the facility's annual review of the background well data. The limits for dissolved arsenic, dissolved lead and total phenols were lowered.
3. On April 16, 1999, a two ft. piece of 4" PVC piping, two air actuated butterfly valves and a manual valve were installed in the V-Tank Building. The streams that historically were unloaded through tank V-7 are now directly pump unloaded to the T-Tank system; therefore, tank V-7 was not being utilized. This change will allow the use of tank V-7.

Sincerely,
WASTE MANAGEMENT OF OHIO, INC.



Stephen C. Lonneman
General Manager

February 10, 1999

DW-8J

CERTIFIED MAIL: P 140 678 613
RETURN RECEIPT REQUESTED

Fred G. Nicar, General Manager
Waste Management of Ohio, Inc.
Vickery Facility
3956 State Route 412
Vickery, Ohio 43464

Re: Class 1 Federal RCRA Permit Modification
Addition of Waste Codes K140 and U408; K169, K170,
K171, and K172
Waste Management of Ohio, Inc.
Vickery, Ohio
OHD 020 273 819

Dear Mr. Nicar:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of Waste Management of Ohio, Inc.'s (WMO) Class 1 Federal Resource Conservation and Recovery Act (RCRA) permit modification for its Vickery facility. WMO originally submitted its Class 1 modification on October 2, 1998, however resubmitted a revised Class 1 modification on January 21, 1999 to replace the original. WMO submitted its Class 1 Federal RCRA permit modification pursuant to Title 40 of the Code of Federal Regulations (40 C.F.R) §270.42(g)(1)(ii) for newly listed waste codes. Waste codes K140 and U408 were published in Federal Register (FR) 63FR24596 and 63FR35147 with an effective listing date of November 4, 1998. Waste codes K169, K170, K171 and K172 were published in FR 63FR42110 with an effective date of February 8, 1999.

The U.S. EPA has reviewed the January 21, 1999, permit modification request and has determined it meets the requirements of 40 C.F.R. §270.42(a). Therefore, the U.S. EPA approves WMO's Class 1 modification to its Federal portion of its RCRA permit to include the waste codes K140 and U408, K169, K170, K171 and K172. Pursuant to 40 C.F.R. §270.42(a)(ii), the facility is required to notify all persons on the facility mailing list within ninety (90) calendar days of the date of this approval.

In addition, WMO is now required to submit its Class 2 Federal RCRA permit modification, in accordance with 40 C.F.R. §270.42(g)(1)(iv) for the waste codes K169, K170, K171 and K172. WMO submitted its Class 2 Federal RCRA permit modification for waste codes K140 and U408 on November 5, 1998.

Should you have any questions, please contact Thomas Matheson, a member of my staff at (312) 886-7569.

Sincerely,

Karl E. Bremer, Chief
Waste Management Branch

cc: Ed Lim, OEPA/CO
Chuck Hull, OEPA/NWDO
File

DW-8J:MATHESON:twm:6-7569:02/09/99:File -F:\user\share\math\Class 1 Mod K104 U408
and K169-K172.wpd\February 10, 1999

WASTE MANAGEMENT BRANCH

SECRETARY	SECRETARY	SECRETARY	SECRETARY	SECRETARY
		OK 2-10 99		James 2/11/99
TYPIST/ AUTHOR	IL/IN/MI SECTION CHIEF	MN/OH/WI SECTION CHIEF	POL.PREV.& SPEC.INTIV SEC. CHIEF	WMB BRANCH CHIEF
2/9/99		ABC 2/10/99		2/11/99

Waste Management of Ohio, Inc.

3956 STATE ROUTE 412 • VICKERY, OHIO 43464 • 419-547-7791 • FAX: 419-547-6144

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

P 311 952 169

January 21, 1999

Mr. David Ullrich
Regional Administrator
U.S. Environmental Protection Agency Region V
77 W. Jackson Blvd.
Chicago, IL 60609

RECEIVED
JAN 23 1999
DIVISION FRONT OFFICE
Waste, Pesticides & Toxics Division
U.S. EPA - REGION 5

Re: Waste Management of Ohio, Inc. - Vickery, Ohio
OHD 020 273 819
RCRA Class 1 Permit Modification

Dear Mr. Ullrich:

In accordance with 40 CFR 270.42(h)(1)(ii), Waste Management of Ohio, Inc. (WMO) submits a Class 1 permit modification for waste codes that are newly listed. This modification replaces a the Class 1 modification submitted October 2, 1998. Included as attachments to this letter is the information required by 40 CFR 270.42(a) and (g). This modification permits the acceptance of waste codes listed below for waste types currently managed at this facility.

<u>Waste Codes</u>	<u>Effective Date of Listing</u>	<u>Federal Register</u>
K140, U408	November 4, 1998	63FR24596; 63FR35147
K169, K170, K171, K172	February 8, 1999	63FR42110

These wastes will be treated (T01) and stored (S02) in tanks, treated by filtration (T04) and deepwell injected (D79).

This modification is classified as a Class 1 Modification based on the criteria presented in 40 CFR 270.42(g) and on the criteria in Appendix I to 40 CFR 270.42, section G.5.d.

Mr. David Ullrich
January 21, 1999
Page 2

Below is a listing of the Attachments:

Attachment 1	Summary of Rule Requirements and Facility Response
Attachment 2	Federal Part A Application Waste Number List
Attachment 3	Revised Language of Section IV.C. of Federal Permit
Attachment 4	Newly Listed Waste Codes and Associated Constituents

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions, please contact Sandy Clark at 419-547-3335.

Sincerely,

WASTE MANAGEMENT OF OHIO, INC.



F.G. Nicar
General Manager

FGN/slc

Attachments

cc w/: Mr. Thomas W. Matheson, USEPA Region V, HRP-8J

Newly Regulated Wastes 40 CFR 270.42(g)(1)...	Rule Requirement	Facility Response
(i)	Existence as hazardous waste facility	WMO Vickery facility is a permitted hazardous waste treatment storage and disposal facility. On October 24, 1994, the Ohio EPA and the US EPA issued the facility a RCRA Part B and HSWA permit, respectively.
(ii)	Class 1 Modification	The facility submits this Class 1 modification in accordance with 40 CFR 270.42(a). The facility has not yet received wastes with waste codes K140 and U408. The rule regulating waste codes K169, K170, K171 or K172 is effective February 8, 1999.
(iii)	Permittee compliance	The permittee is in compliance with the applicable standards of 40 CFR 265 and 266.
(iv)	Class 2 Modification	A complete Class 2 modification request for the addition of K140 and U408 was submitted on November 5, 1998. A complete Class 2 modification request for the addition of K179, K170, K171 and K172 will be submitted on or after the February 8, 1999.
(v)	Land Disposal Units	Non-Applicable

Class 1 Modification 40 CFR 270.42(a)(1)...	Rule Requirement	Facility Response
(i)	Notification to Director.	This notification meets the requirements of this rule. This change is necessary in order to manage wastes which are otherwise acceptable with the facility design.
	40 CFR 270.13-Part A	See Attachment 2 for the Federal Part A Application Waste Number List.
	40 CFR 270.14-Part B	<p>See Attachment 3 for the revised language of page 17 of the facility's Federal Permit.</p> <p>See Attachment 4 for the Newly Listed Waste Codes and Associated Constituents. There are no revisions to the Part B Application. The addition of these codes will not require any additional or different management practices. There will be no addition to or change in the treatment process. Blending of wastes will still occur in tanks. Filtration of the waste stream will occur in the existing, permitted filtration operations. All wastes will pass the currently approved Waste Analysis Plan requirements, thereby demonstrating that they are the same type of waste the facility currently and previously has managed. No new fire protection is required.</p>

Class 1 Modification 40 CFR 270.42(a)(1)...	Rule Requirement	Facility Response
(i) (cont'd)	40 CFR 270.15- Containers	The facility does not manage hazardous wastes in these types of units under this rule.
	40 CFR 270.16-Tanks	The addition of these codes will not require any additional or different management practices. There will be no addition to or change in the treatment process. Blending of wastes will still occur in tanks. Filtration of the waste stream will occur in the existing, permitted filtration operations. All wastes will pass the currently approved Waste Analysis Plan requirements, thereby demonstrating that they are the same type of waste the facility currently and previously has managed. No new fire protection is required.
	40 CFR 270.17 to 40 CFR 270.21; 40 CFR 270.62 and 40 CFR 270.63 Surface Impoundments, waste piles, incinerators, land treatment.	The facility does not manage hazardous wastes in these types of units.
(ii)	Notification to those on mailing list.	This notification was made on October 13, 1998.

Attachment 2
Federal Part A Application Waste Number List, Modified 1/21/99

	WASTE CODE	PROCESS CODE	
1.	D004	S01, S02, T01, T04, D79	
2.	D005	S01, S02, T01, T04, D79	
3.	D006	S01, S02, T01, T04, D79	
4.	D007	S01, S02, T01, T04, D79	
5.	D008	S01, S02, T01, T04, D79	
6.	D009	S01, S02, T01, T04, D79	
7.	D010	S01, S02, T01, T04, D79	
8.	D011	S01, S02, T01, T04, D79	
9.	D012	S01, S02, T01, T04, D79	
10.	D013	S01, S02, T01, T04, D79	
11.	D014	S01, S02, T01, T04, D79	
12.	D015	S01, S02, T01, T04, D79	
13.	D016	S01, S02, T01, T04, D79	
14.	D017	S01, S02, T01, T04, D79	
15.	D018	S01, S02, T01, T04, D79	
16.	D019	S01, S02, T01, T04, D79	
17.	D020	S01, S02, T01, T04, D79	
18.	D021	S01, S02, T01, T04, D79	
19.	D022	S01, S02, T01, T04, D79	
20.	D023	S01, S02, T01, T04, D79	
21.	D024	S01, S02, T01, T04, D79	
22.	D025	S01, S02, T01, T04, D79	
23.	D026	S01, S02, T01, T04, D79	
24.	D027	S01, S02, T01, T04, D79	
25.	D028	S01, S02, T01, T04, D79	
26.	D029	S01, S02, T01, T04, D79	
27.	D030	S01, S02, T01, T04, D79	
28.	D031	S01, S02, T01, T04, D79	
29.	D032	S01, S02, T01, T04, D79	
30.	D033	S01, S02, T01, T04, D79	
31.	D034	S01, S02, T01, T04, D79	

Federal Part A Application Waste Number List, Modified 1/21/99

	WASTE CODE	PROCESS CODE	
32.	D035	S01, S02, T01, T04, D79	
33.	D036	S01, S02, T01, T04, D79	
34.	D037	S01, S02, T01, T04, D79	
35.	D038	S01, S02, T01, T04, D79	
36.	D039	S01, S02, T01, T04, D79	
37.	D040	S01, S02, T01, T04, D79	
38.	D041	S01, S02, T01, T04, D79	
39.	D042	S01, S02, T01, T04, D79	
40.	D043	S01, S02, T01, T04, D79	
41.	F032	S01, S02, T01, T04, D79	
42.	F034	S01, S02, T01, T04, D79	
43.	F035	S01, S02, T01, T04, D79	
44.	K140	S01, S02, T01, T04, D79	
45.	K141	S01, S02, T01, T04, D79	
46.	K142	S01, S02, T01, T04, D79	
47.	K143	S01, S02, T01, T04, D79	
48.	K144	S01, S02, T01, T04, D79	
49.	K145	S01, S02, T01, T04, D79	
50.	K146	S01, S02, T01, T04, D79	
51.	K147	S01, S02, T01, T04, D79	
52.	K148	S01, S02, T01, T04, D79	
53.	K149	S01, S02, T01, T04, D79	
54.	K150	S01, S02, T01, T04, D79	
55.	K151	S01, S02, T01, T04, D79	
56.	K156	S01, S02, T01, T04, D79	
57.	K157	S01, S02, T01, T04, D79	
58.	K158	S01, S02, T01, T04, D79	
59.	K159	S01, S02, T01, T04, D79	
60.	K160	S01, S02, T01, T04, D79	
61.	K161	S01, S02, T01, T04, D79	
62.	K169	S01, S02, T01, T04, D79	

Federal Part A Application Waste Number List, Modified 1/21/99

	WASTE CODE	PROCESS CODE	
63.	K170	S01, S02, T01, T04, D79	
64.	K171	S01, S02, T01, T04, D79	
65.	K172	S01, S02, T01, T04, D79	
66.	P127	S01, S02, T01, T04, D79	
67.	P128	S01, S02, T01, T04, D79	
68.	P185	S01, S02, T01, T04, D79	
69.	P188	S01, S02, T01, T04, D79	
70.	P189	S01, S02, T01, T04, D79	
71.	P190	S01, S02, T01, T04, D79	
72.	P191	S01, S02, T01, T04, D79	
73.	P192	S01, S02, T01, T04, D79	
74.	P194	S01, S02, T01, T04, D79	
75.	P196	S01, S02, T01, T04, D79	
76.	P197	S01, S02, T01, T04, D79	
77.	P198	S01, S02, T01, T04, D79	
78.	P199	S01, S02, T01, T04, D79	
79.	P201	S01, S02, T01, T04, D79	
80.	P202	S01, S02, T01, T04, D79	
81.	P203	S01, S02, T01, T04, D79	
82.	P204	S01, S02, T01, T04, D79	
83.	P205	S01, S02, T01, T04, D79	
84.	U271	S01, S02, T01, T04, D79	
85.	U277	S01, S02, T01, T04, D79	
86.	U278	S01, S02, T01, T04, D79	
87.	U279	S01, S02, T01, T04, D79	
88.	U280	S01, S02, T01, T04, D79	
89.	U364	S01, S02, T01, T04, D79	
90.	U365	S01, S02, T01, T04, D79	
91.	U366	S01, S02, T01, T04, D79	
92.	U367	S01, S02, T01, T04, D79	
93.	U372	S01, S02, T01, T04, D79	

Federal Part A Application Waste Number List, Modified 1/21/99

	WASTE CODE	PROCESS CODE	
94.	U373	S01, S02, T01, T04, D79	
95.	U375	S01, S02, T01, T04, D79	
96.	U376	S01, S02, T01, T04, D79	
97.	U377	S01, S02, T01, T04, D79	
98.	U378	S01, S02, T01, T04, D79	
99.	U379	S01, S02, T01, T04, D79	
100.	U381	S01, S02, T01, T04, D79	
101.	U382	S01, S02, T01, T04, D79	
102.	U383	S01, S02, T01, T04, D79	
103.	U384	S01, S02, T01, T04, D79	
104.	U385	S01, S02, T01, T04, D79	
105.	U386	S01, S02, T01, T04, D79	
106.	U387	S01, S02, T01, T04, D79	
107.	U389	S01, S02, T01, T04, D79	
108.	U390	S01, S02, T01, T04, D79	
109.	U391	S01, S02, T01, T04, D79	
110.	U392	S01, S02, T01, T04, D79	
111.	U393	S01, S02, T01, T04, D79	
112.	U394	S01, S02, T01, T04, D79	
113.	U395	S01, S02, T01, T04, D79	
114.	U396	S01, S02, T01, T04, D79	
115.	U400	S01, S02, T01, T04, D79	
116.	U401	S01, S02, T01, T04, D79	
117.	U402	S01, S02, T01, T04, D79	
118.	U403	S01, S02, T01, T04, D79	
119.	U404	S01, S02, T01, T04, D79	
120.	U408	S01, S02, T01, T04, D79	
121.	U409	S01, S02, T01, T04, D79	
122.	U410	S01, S02, T01, T04, D79	
123.	U411	S01, S02, T01, T04, D79	

Attachment 3
Revised Language of Section IV.C. (Page 17 of 19) of Federal Permit

C. OTHER WASTE IDENTIFICATION

The Permittee may store, treat and dispose of the following wastes in containers, tanks, filtration unit and injection wells at the facility subject to the terms of the RCRA permit.

<u>Description of Hazardous Waste</u>	<u>EPA Hazardous Waste Number</u>	<u>Maximum Volume</u>	<u>Description of Unit(s)</u>
Solid and Liquid Waste	See list below	678,920 gallons	Container Storage (S01)
Liquid Waste	See list below	1,102,600	Tank Storage (S02)
Liquid Waste	See list below	650,000 gallons/day	Treatment in Tanks (T01)
Liquid Waste	See list below	650,000 gallons/day	Filtration (T04)
Liquid Waste	See list below	2.4x10 ⁹ gallons	Injection Well Disposal (D79)

EPA Hazardous Waste Numbers: F032, F034, F035, **K140**, K141, K142, K143, K144, K145, K146, K147, K148, K149, K150, K151, K156, K157, K158, K159, K160, K161, **K169**, **K170**, **K171**, **K172**, P127, P128, P185, P188, P189, P190, P191, P192, P194, P196, P197, P198, P199, P201, P202, P203, P204, P205, U271, U277, U278, U279, U280, U364, U365, U366, U367, U372, U373, U375, U376, U377, U378, U379, U381, U382, U383, U384, U385, U386, U387, U389, U390, U391, U392, U393, U394, U395, U396, U400, U401, U402, U403, U404, **U408**, U409, U410, U411.

Attachment 4
Newly Listed Waste Codes and Associated Constituents

WASTE CODE	CONSTITUENT	
K140	2,4,6 Tribromophenol	
K169	Benzene	
K170	Benzene	
	Benzo(a)pyrene	
	Dibenz(a,h)anthracene	
	Benzo(a)anthracene (aka Benz(a)anthracene)	
	Benzo fluoranthene	
	Benzo(k)fluoranthene	
	3-Methylcholanthrene	
	7,12-Dimethylbenz(a)anthracene	
K171	Benzene	
	Arsenic	
K172	Benzene	
	Arsenic	
U408	2,4,6 Tribromophenol	

WASTE MANAGEMENT OF OHIO, INC.

3956 STATE ROUTE 412 • VICKERY, OHIO 43464 • 419-547-7791 • FAX: 419-547-6144

October 13, 1998

Re: Waste Management of Ohio, Inc. Vickery, Ohio Facility
OHD 020 273 819
RCRA Class 1 Permit Modifications

Dear Citizen:

Your name is on the "facility mailing list" for Waste Management of Ohio, Inc. (WMO) Vickery, Ohio. As required by OAC 3745-50-51(D)(1)(a)(ii), WMO is informing you of the following Class 1 Modifications for its Ohio Hazardous Waste Management Permit issued October 24, 1994.

1. Effective July 20, 1998, page 300RR-1 of Section D of the Part B Application was renumbered as page 300EEE-1.
2. Additional connections to the discharge piping for unloading were installed to provide flexibility for unloading during the replacement of the V-Tank System. This change was effective July 20, 1998. Appendix 15 of the facility's Part B Application was updated.
3. A pump for direct unloading was relocated from outside the unloading building to inside the unloading building and the necessary fibercast piping was installed. This work was completed on July 28, 1998. Section D and Appendix 15 of the facility's Part B Application were updated.

As required by 40 CFR 270.42(a)(1)(ii), WMO is informing you of the following Class 1 Modification for its Federal Hazardous Waste Management Permit issued October 24, 1994.

1. On October 2, 1998, WMO submitted a Class 1 modification to add certain waste codes, K140, U408, K169, K170, K171 and K172, to WMO's US EPA Federal Hazardous Waste Management Permit.

Sincerely,
WASTE MANAGEMENT OF OHIO, INC.



Fred Nicar
General Manager

FGN/slc

Waste Management of Ohio, Inc.

3956 STATE ROUTE 412 • VICKERY, OHIO 43464 • 419-547-7791 • FAX: 419-547-6144

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

P 311 952 066

October 2, 1998

Mr. David Ullrich
Regional Administrator
U.S. Environmental Protection Agency Region V
77 W. Jackson Blvd.
Chicago, IL 60609

RECEIVED
OCT 08 1998
DIVISION FRONT OFFICE
Waste, Pesticides & Toxics Division
U.S. EPA - REGION 5

Re: Waste Management of Ohio, Inc. - Vickery, Ohio
OHD 020 273 819
RCRA Class 1 Permit Modification

Dear Mr. Ullrich:

In accordance with 40 CFR 270.42(h)(1)(ii), Waste Management of Ohio, Inc. (WMO) submits a Class 1 permit modification for waste codes that are newly listed. This modification permits the acceptance of waste codes listed below for waste types currently managed at this facility.

<u>Waste Codes</u>	<u>Effective Date of Listing</u>	<u>Federal Register</u>
K140, U408	November 4, 1998	63FR24596; 63FR35147
K169, K170, K171, K172	February 8, 1999	63FR42110

These wastes will be treated (T01) and stored (S02) in tanks, treated by filtration (T04) and deepwell injected (D79). This change is necessary in order to manage wastes which are otherwise acceptable with the facility design.

This modification is classified as a Class I Modification based on the criteria presented in 40 CFR 270.42(g) and on the criteria in Appendix I to 40 CFR 270.42, section G.5.d.

The addition of these codes will not require any additional or different management practices. There will be no addition to or change in the treatment process. Blending

Mr. David Ullrich
October 2, 1998
Page 2

of wastes will still occur in tanks. Filtration of the waste stream will occur in the existing, permitted filtration operations. All wastes will pass the currently approved Waste Analysis Plan requirements, thereby demonstrating that they are the same type of waste the facility currently and previously has managed. No new fire protection is required.

As required by 40 CFR 270.42(a)(1)(ii), WMO will send notification of the modification to all persons on the facility mailing list, as maintained by the Director and all appropriate State and local government. These notifications will be made within 90 days after the date of this submittal.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions, please contact Sandy Clark at 419-547-3335.

Sincerely,

WASTE MANAGEMENT OF OHIO, INC.



F.G. Nicor
General Manager

FGN/slc

cc: Mr. Thomas W. Matheson, USEPA Region V, HRP-8J

Waste Management of Ohio, Inc.

3956 STATE ROUTE 412 • VICKERY, OHIO 43464 • 419-547-7791 • FAX: 419-547-6144

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

P 311 952 066

October 2, 1998

Mr. David Ullrich
Regional Administrator
U.S. Environmental Protection Agency Region V
77 W. Jackson Blvd.
Chicago, IL 60609

Re: Waste Management of Ohio, Inc. - Vickery, Ohio
OHD 020 273 819
RCRA Class 1 Permit Modification

Dear Mr. Ullrich:

In accordance with 40 CFR 270.42(h)(1)(ii), Waste Management of Ohio, Inc. (WMO) submits a Class 1 permit modification for waste codes that are newly listed. This modification permits the acceptance of waste codes listed below for waste types currently managed at this facility.

<u>Waste Codes</u>	<u>Effective Date of Listing</u>	<u>Federal Register</u>
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This modification is classified as a Class 1 Modification based on the criteria presented in 40 CFR 270.42(g) and on the criteria in Appendix I to 40 CFR 270.42, section G.5 d.

The addition of these codes will not require any additional or different management practices. There will be no addition to or change in the treatment process. Blending

Mr. David Ullrich
October 2, 1998
Page 2

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As required by 40 CFR 270.42(a)(1)(ii), WMO will send notification of the modification to all persons on the facility mailing list, as maintained by the Director and all appropriate State and local government. These notifications will be made within 90 days after the date of this submittal.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions, please contact Sandy Clark at 419-547-3335.

Sincerely,

WASTE MANAGEMENT OF OHIO, INC.



F.G. Nicor
General Manager

FGN/slc

cc: Mr. Thomas W. Matheson, USEPA Region V, HRP-8J

CHEMICAL WASTE MANAGEMENT, INC.

3956 STATE ROUTE 412 • VICKERY, OHIO 43464 • 419-547-7791 • FAX: 419-547-6144

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P 311 951 955

RECEIVED
JUN 27 1997

DIVISION FRONT OFFICE
Waste, Pesticides & Toxics Division
U.S. EPA - REGION 5

June 19, 1997

Mr. Valdus Adamkus
Regional Administrator
U.S. Environmental Protection Agency Region V
77 W. Jackson Blvd.
Chicago, IL 60609

Re: Chemical Waste Management, Inc. - Vickery, Ohio
OHD 020 273 819
RCRA Class 1 Permit Modification

Dear Mr. Adamkus:

Chemical Waste Management, Inc. (CWM) at Vickery, Ohio requests a permit modification for the addition of waste code P-202 to its Federal RCRA Permit (Permit). Due to a U.S. EPA typographical error, this waste code was omitted from the revised page 17 of the Permit issued by the U.S. EPA on 6/20/96. This waste code was included in CWM's original permit modification requests dated 2/24/95, 3/2/95 and 2/2/96. Copies of these correspondence are included as attachments to this letter.

This request is to allow treatment (T01) and storage (S02) in tanks, filtration (T04) and injection well disposal (D79). In addition, CWM requests that this code be approved for storage in containers (S01). As of the date of this letter, CWM has not received this waste code.

Based on this information, this modification appears to meet the criteria of A.2. of Appendix I to 40 CFR 270.42 - Classification of Permit Modifications.

In addition, as explained in the original submittals, the addition of this code will not require any additional or different management practices. The waste will be similar to

Mr. Valdus Adamkus
June 19, 1997
Page 2

those wastes currently approved. The waste will meet all acceptance criteria in our currently approved Waste Analysis Plan. Therefore, no new tanks or tank system designs are required. No new fire protection is required.

There will be no addition or change in the treatment process. Blending of wastes will still occur in the tanks. Filtration of the waste stream will occur in the existing, permitted filtration operations.

Container storage will be performed as previously approved in the USEPA Hazardous Waste Management Permit issued October 24, 1994. There will be no additional units or changes in treatment processes or management standards.

As required by 40 CFR 270.42(a)(1)(ii), CWM will send notification of the modification to all persons on the facility mailing list, as maintained by the Director and all appropriate State and local government. These notifications will be made within 90 days after the date of this submittal.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

CHEMICAL WASTE MANAGEMENT, INC.



F.G. Nicari
General Manager

FGN/SLC
Attachments

Mr. Valdus Adamkus

June 19, 1997

Page 3

cc w/: Thomas W. Matheson, USEPA Region V, HRP-8J

Chemical Waste Management, Inc.

3956 STATE ROUTE 412 • VICKERY, OHIO 43464 • 419-547-7791 • FAX: 419-547-6144

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

P 602 174 336

February 2, 1996

Regional Administrator
USEPA - Region V
230 S. Dearborn
Chicago, IL 60604

Dear Regional Administrator:

Chemical Waste Management, Inc., (CWM) Vickery, Ohio is submitting to your office the attached Class 2 modification for its Resource Conservation and Recovery Act permit (OHD 020 273 819 issued 10/24/94). This permit modification is requested due to promulgation of new waste numbers in the Federal Register on February 9, 1995. These newly identified waste numbers are commonly referred to as the Carbamate waste numbers. If you have any questions, please contact Steve Lonneman at 419-547-7791.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely yours,

Chemical Waste Management, Inc.



F.G. Nicar
General Manager

FGN/SCL/
Attachment

Class 2 Modification requirements:

- (1)(i) Describes the exact change to be made to the permit conditions and supporting documents referenced by the permit.

The facility adds the following waste numbers to its current hazardous waste management permit:

K156,K157,K158,K159,K160,K161,P127,P128,P185,P188,P189,
P190,P191,P192,P194,P196,P197,P198,P199,P201,P202,P203,
P204,P205,U271,U277,U278,U278,U279,U280,U364,U365,U366,
U367,U372,U373,U375,U376,U377,U378,U379,U381,U382,
U383,U384,U385,U386,U387,U389,U390,U391,U392,
U393,U394,U395,U396,U400,U401,U402,U403,U404,U409,
U410,U411

- (1)(ii) Identifies that the modification is a Class 2 modification.

40CFR270.42(g)(iv) states "The permittee also submits a complete Class 2 or 3 modification request within 180 days of the effective date of the rule listing or identifying the waste, or subjecting the unit to RCRA Subtitle C management standards". Therefore, this Class 2 modification request is being submitted.

- (1)(iii) Explains why the modification is needed.

As explained in (1)(ii) above, 40CFR270.42(g)(iv) requires this submission in order to continue managing these newly regulated wastes.

- (1)(iv) Provides the applicable information required by 270.13 through 270.21, 270.62, and 270.63.

The only change is the addition of these waste numbers. The type of waste managed at the facility has not changed. The facility previously managed wastes which may have had these waste numbers. These waste will be managed in the currently permitted facility as it is designed. No new equipment or procedures will be required. The waste will be evaluated using the currently approved waste analysis plan.

Therefore, the only change is to the list of waste numbers in the Part

A section of the permit application. Attachment 1 is an updated waste number list that includes all waste numbers for the facility including these newly regulated numbers.

- (2) The permittee must send a notice of the modification request to all persons on the facility mailing list maintained by the Director and to the appropriate units of State and local government... and must publish this notice in a major local newspaper of general circulation.

Attachment 2 is a copy of the notice that was sent to all required persons and that will be published in the Fremont News Messenger on Monday, February 5, 1996.

- (3) The permittee must place a copy of the permit modification request and supporting documents in a location accessible to the public in the vicinity of the permitted facility.

The required information will be place at the Birchard Public Library of Sandusky County in Fremont, Ohio.

Attachment 1 - Federal Part A Application Waste Number List, Modified 2/1/96

	WASTE NUMBER	PROCESS CODE
1.	D004	S01,S02,T01,T04,D79
2.	D005	S01,S02,T01,T04,D79
3.	D006	S01,S02,T01,T04,D79
4.	D007	S01,S02,T01,T04,D79
5.	D008	S01,S02,T01,T04,D79
6.	D009	S01,S02,T01,T04,D79
7.	D010	S01,S02,T01,T04,D79
8.	D011	S01,S02,T01,T04,D79
9.	D012	S01,S02,T01,T04,D79
10.	D013	S01,S02,T01,T04,D79
11.	D014	S01,S02,T01,T04,D79
12.	D015	S01,S02,T01,T04,D79
13.	D016	S01,S02,T01,T04,D79
14.	D017	S01,S02,T01,T04,D79
15.	D018	S01,S02,T01,T04,D79
16.	D019	S01,S02,T01,T04,D79
17.	D020	S01,S02,T01,T04,D79
18.	D021	S01,S02,T01,T04,D79
19.	D022	S01,S02,T01,T04,D79
20.	D023	S01,S02,T01,T04,D79
21.	D024	S01,S02,T01,T04,D79
22.	D025	S01,S02,T01,T04,D79
23.	D026	S01,S02,T01,T04,D79
24.	D027	S01,S02,T01,T04,D79
25.	D028	S01,S02,T01,T04,D79

Federal Part A Application Waste Number List, Modified 2/1/96, Continued

	WASTE NUMBER	PROCESS CODE
26.	D029	S01,S02,T01,T04,D79
27.	D030	S01,S02,T01,T04,D79
28.	D031	S01,S02,T01,T04,D79
29.	D032	S01,S02,T01,T04,D79
30.	D033	S01,S02,T01,T04,D79
31.	D034	S01,S02,T01,T04,D79
32.	D035	S01,S02,T01,T04,D79
33.	D036	S01,S02,T01,T04,D79
34.	D037	S01,S02,T01,T04,D79
35.	D038	S01,S02,T01,T04,D79
36.	D039	S01,S02,T01,T04,D79
37.	D040	S01,S02,T01,T04,D79
38.	D041	S01,S02,T01,T04,D79
39.	D042	S01,S02,T01,T04,D79
40.	D043	S01,S02,T01,T04,D79
41.	F032	S01,S02,T01,T04,D79
42.	F034	S01,S02,T01,T04,D79
43.	F035	S01,S02,T01,T04,D79
44.	K141	S01,S02,T01,T04,D79
45.	K142	S01,S02,T01,T04,D79
46.	K143	S01,S02,T01,T04,D79
47.	K144	S01,S02,T01,T04,D79
48.	K145	S01,S02,T01,T04,D79
49.	K146	S01,S02,T01,T04,D79
50.	K147	S01,S02,T01,T04,D79

Federal Part A Application Waste Number List, Modified 2/1/96, Continued

	WASTE NUMBER	PROCESS CODE
51.	K148	S01,S02,T01,T04,D79
52.	K149	S01,S02,T01,T04,D79
53.	K150	S01,S02,T01,T04,D79
54.	K151	S01,S02,T01,T04,D79
55.	K156	S01,S02,T01,T04,D79
56.	K157	S01,S02,T01,T04,D79
57.	K158	S01,S02,T01,T04,D79
58.	K159	S01,S02,T01,T04,D79
59.	K160	S01,S02,T01,T04,D79
60.	K161	S01,S02,T01,T04,D79
61.	P127	S01,S02,T01,T04,D79
62.	P128	S01,S02,T01,T04,D79
63.	P185	S01,S02,T01,T04,D79
64.	P188	S01,S02,T01,T04,D79
65.	P189	S01,S02,T01,T04,D79
66.	P190	S01,S02,T01,T04,D79
67.	P191	S01,S02,T01,T04,D79
68.	P192	S01,S02,T01,T04,D79
69.	P194	S01,S02,T01,T04,D79
70.	P196	S01,S02,T01,T04,D79
71.	P197	S01,S02,T01,T04,D79
72.	P198	S01,S02,T01,T04,D79
73.	P199	S01,S02,T01,T04,D79
74.	P201	S01,S02,T01,T04,D79
75.	P202	S01,S02,T01,T04,D79

Federal Part A Application Waste Number List, Modified 2/1/96, Continued

	WASTE NUMBER	PROCESS CODE
76.	P203	S01,S02,T01,T04,D79
77.	P204	S01,S02,T01,T04,D79
78.	P205	S01,S02,T01,T04,D79
79.	U271	S01,S02,T01,T04,D79
80.	U277	S01,S02,T01,T04,D79
81.	U278	S01,S02,T01,T04,D79
82.	U278	S01,S02,T01,T04,D79
83.	U279	S01,S02,T01,T04,D79
84.	U280	S01,S02,T01,T04,D79
85.	U364	S01,S02,T01,T04,D79
86.	U365	S01,S02,T01,T04,D79
87.	U366	S01,S02,T01,T04,D79
88.	U367	S01,S02,T01,T04,D79
89.	U372	S01,S02,T01,T04,D79
90.	U373	S01,S02,T01,T04,D79
91.	U375	S01,S02,T01,T04,D79
92.	U376	S01,S02,T01,T04,D79
93.	U377	S01,S02,T01,T04,D79
94.	U378	S01,S02,T01,T04,D79
95.	U379	S01,S02,T01,T04,D79
96.	U381	S01,S02,T01,T04,D79
97.	U382	S01,S02,T01,T04,D79
98.	U383	S01,S02,T01,T04,D79
99.	U384	S01,S02,T01,T04,D79
100.	U385	S01,S02,T01,T04,D79

Federal Part A Application Waste Number List, Modified 2/1/96, Continued

	WASTE NUMBER	PROCESS CODE
101.	U386	S01,S02,T01,T04,D79
102.	U387	S01,S02,T01,T04,D79
103.	U389	S01,S02,T01,T04,D79
104.	U390	S01,S02,T01,T04,D79
105.	U391	S01,S02,T01,T04,D79
106.	U392	S01,S02,T01,T04,D79
107.	U393	S01,S02,T01,T04,D79
108.	U394	S01,S02,T01,T04,D79
109.	U395	S01,S02,T01,T04,D79
110.	U396	S01,S02,T01,T04,D79
111.	U400	S01,S02,T01,T04,D79
112.	U401	S01,S02,T01,T04,D79
113.	U402	S01,S02,T01,T04,D79
114.	U403	S01,S02,T01,T04,D79
115.	U404	S01,S02,T01,T04,D79
116.	U409	S01,S02,T01,T04,D79
117.	U410	S01,S02,T01,T04,D79
118.	U411	S01,S02,T01,T04,D79

C. OTHER WASTE IDENTIFICATION

The Permittee may store, treat and dispose of the following wastes in containers, tanks, filtration unit and injection wells at the facility subject to the terms of the RCRA permit.

<u>Description of Hazardous Waste</u>	<u>EPA Hazardous Waste Number</u>	<u>Maximum Volume</u>	<u>Description of Unit(s)</u>
Solid and Liquid Waste	See list below	678,920 gallons	Container Storage (S01)
Liquid Waste	See list below	1,102,600	Tank Storage (S02)
Liquid Waste	See list below	650,000 gallons/day	Treatment in Tanks (T01)
Liquid Waste	See list below	650,000 gallons/day	Filtration (T04)
Liquid Waste	See list below	2.4x10 ⁹ gallons	Injection Well Disposal (D79)

F032*, F034*, F035*, K141, K142, K143, K144, K145, K146, K147, K148, K149, K150, K151, K156**, K157**, K158**, K159**, K160**, K161**, P127**, P128**, P185**, P188**, P189**, P190**, P191**, P192**, P194**, P196**, P197**, P198**, P199**, P201**, P202**, P203**, P204**, P205**, U271**, U277**, U278**, U279**, U280**, U364**, U365**, U366**, U367**, U372**, U373**, U375**, U376**, U377**, U378**, U379**, U381**, U382**, U383**, U384**, U385**, U386**, U387**, U389**, U390**, U391**, U392**, U393**, U394**, U395**, U396**, U400**, U401**, U402**, U403**, U404**, U409**, U410**, U411**

*Waste Numbers added as Class 1 Modification on January 31, 1995.

**Waste Numbers added per this Class 2 Modification.

Attachment 2

PUBLIC NOTICE

Chemical Waste Management, Inc, located at 3956 State Route 412, Vickery, Ohio has requested a Class 2 Modification of its Federal Hazardous Waste Operating Permit. This request would allow the facility to continue receive the Carbamate waste codes which were published in the February 9, 1995 Federal Register. The newly listed wastes codes are:

K156,K157,K158,K159,K160,K161,P127,P128,P185,P188,P189,P190,P191,P192,
P194,P196,P197,P198,P199,P201,P202,P203,P204,P205,U271,U277,U278,U278,
U279,U280,U364,U365,U366,U367,U372,U373,U375,U376,U377,U378,U379,
U381,U382,U383,U384,U385,U386,U387,U389,U390,U391,U392,U393,U394,
U395,U396,U400,U401,U402,U403,U404,U409,U410,U411

A 60 day comment period will be from February 5, 1996 through April 4, 1996.
Comments may be sent to:

Mr. Thomas W. Matheson, HRP-8J
USEPA Region V
Office of RCRA, Waste Management Division
77 West Jackson Blvd.
Chicago, IL 60604-3590

Chemical Waste Management will host a Public Meeting to provide information related to this request. The meeting will be held at 10:00 am on Tuesday, March 5, 1996 at the Sandusky County Board of Health Conference Room located at 2000 Countryside Drive, Fremont, Ohio.

The following individuals may be contacted:

Chemical Waste Management
Fred G. Nicar, General Manager
Expert
(419) 547-7791

USEPA Region V
Thomas W. Matheson, Corrective Action
(312) 886-7569

Copies of the modification request may be viewed and copied at the Birchard Public Library of Sandusky County. The permittee's compliance history during the life of the permit being modified is available from the Agency contact person.

CHEMICAL WASTE MANAGEMENT, INC.

3956 STATE ROUTE 412 • VICKERY, OHIO 43464 • 419-547-7791 • FAX: 419-547-6144

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
P 228 284 836

March 2, 1995

Mr. Valdus Adamkus
Regional Administrator
U.S. Environmental Protection Agency Region V
77 W. Jackson Blvd.
Chicago, IL 60609

Dear Mr. Adamkus:

On February 24, 1995, Chemical Waste Management, Inc. (CWM) at Vickery, Ohio requested a permit modification for the addition of the newly regulated waste codes identified in 60 FR 7824-7859 (February 9, 1995 Federal Register). A list of these codes was attached. The attached list did not contain 6 waste codes that were included in the new list. Those codes are P127, P128, P199, U279, U404 and U411. Attached to this letter is a revised list that includes these codes. CWM requests this list be used in replacement of the list submitted on February 24.

Our EPA ID # is OHD 020 273 819. This request is to allow treatment (T01) and storage (S02) in tanks, filtration (T04) and injection well disposal (D79). Prior to the issuance of the new regulations, these wastes were possibly managed by the facility in the current treatment and storage operations as part of a scrubber water stream or some other stream. In addition, CWM requests that these codes be approved for storage in containers (S01).

The addition of these codes will not require any additional or different management practices. The wastes will be similar to those wastes currently approved. The wastes will meet all acceptance criteria in our currently approved Waste Analysis Plan. Therefore, no new tanks or tank system designs are required. No new fire protection is required.

There will be no addition or change in the treatment process. Blending of wastes will still occur in the tanks. Filtration of the waste stream will occur in the existing,

Mr. Valdas Adamkus
Page 2
March 2, 1995

permitted filtration operations.

Container storage will be performed as previously approved in the USEPA Hazardous Waste Management Permit issued October 24, 1994. There will be no additional units or changes in treatment processes or management standards.

Based on this information, this modification appears to meet the criteria of F.4.b. and G.5.d. of Appendix I to 40 CFR 270.42 - Classification of Permit Modifications.

As required by 40 CFR 270.42(a)(1)(ii), CWM will send notification of the modification to all persons on the facility mailing list, as maintained by the Director and all appropriate State and local government. These notifications will be made within 90 days after receipt of the permit modification from USEPA.

If you have any questions, please contact Steve Lonneman at (419) 547-7791, ext. 317.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,



F.G. Nicar
General Manager

FGN/SCL/

Attachment

Mr. Valdas Adamkus
Page 3
March 2, 1995

cc: Thomas W. Matheson, USEPA Region V, HRP-8J
Agency Correspondence File

NEWLY LISTED WASTE CODES
- 60 FR 7824-7859

Revised 3/2/95

EPA
HAZARDOUS
WASTE NO.

EPA
HAZARDOUS
WASTE NO.

EPA
HAZARDOUS
WASTE NO.

U280

K156

U401

U364

K157

U402

U365

K158

U403

U366

K159

U404

U367

K160

U407

U372

K161

U409

U373

P127

U410

U375

P128

U411

U376

P185

U377

P188

U378

P189

U379

P190

U381

P191

U382

P192

U383

P194

U384

P196

U385

P197

U386

P198

U387

P199

U389

P201

U390

P202

U391

P203

U392

P204

U393

P205

U394

U271

U395

U277

U396

U278

U400

U279

CHEMICAL WASTE MANAGEMENT, INC.

3956 STATE ROUTE 412 • VICKERY, OHIO 43464 • 419-547-7791 • FAX: 419-547-6144

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
P 228 284 835

February 24, 1995

Mr. Valdus Adamkus
Regional Administrator
U.S. Environmental Protection Agency Region V
77 W. Jackson Blvd.
Chicago, IL 60609

Dear Mr. Adamkus:

Chemical Waste Management, Inc. (CWM) at Vickery, Ohio requests a permit modification for the addition of the newly regulated waste codes identified in 60 FR 7824-7859 (February 9, 1995 Federal Register). A list of these codes is attached. Our EPA ID # is OHD 020 273 819. This request is to allow treatment (T01) and storage (S02) in tanks, filtration (T04) and injection well disposal (D79). Prior to the issuance of the new regulations, these wastes were possibly managed by the facility in the current treatment and storage operations as part of a scrubber water stream or some other stream. In addition, CWM requests that these codes be approved for storage in containers (S01).

The addition of these codes will not require any additional or different management practices. The wastes will be similar to those wastes currently approved. The wastes will meet all acceptance criteria in our currently approved Waste Analysis Plan. Therefore, no new tanks or tank system designs are required. No new fire protection is required.

There will be no addition or change in the treatment process. Blending of wastes will still occur in the tanks. Filtration of the waste stream will occur in the existing, permitted filtration operations.

Container storage will be performed as previously approved in the USEPA Hazardous Waste Management Permit issued October 24, 1994. There will be no additional units or changes in treatment processes or management standards.


Mr. Valdas Adamkus
Page 2
February 24, 1995

Based on this information, this modification appears to meet the criteria of F.4.b. and G.5.d. of Appendix I to 40 CFR 270.42 - Classification of Permit Modifications.

As required by 40 CFR 270.42(a)(1)(ii), CWM will send notification of the modification to all persons on the facility mailing list, as maintained by the Director and all appropriate State and local government. These notifications will be made within 90 days after receipt of the permit modification from USEPA.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,


F.G. Nicar
General Manager

FGN/SCL/

Attachment

cc: Thomas W. Matheson, USEPA Region V, HRP-8J
Agency Correspondence File

NEWLY LISTED WASTE CODES - 60 FR 7824-7859

EPA Hazardous Waste No.

K156

K157

K158

K159

K160

K161

P185

P188

P189

P190

P191

P192

P194

P196

P197

P198

P201

P202

P203

P204

P205

U271

U277

U278

U280

U364

U365

~~U366~~

U367

NEWLY LISTED WASTE CODES - 60 FR 7824-7859

EPA Hazardous Waste No.

U372

U373

U375

U376

U377

U378

U379

U381

U382

U383

U384

U385

U386

U387

U389

U390

U391

U392

U393

U394

U395

U396

U400

U401

U402

U403

U407

~~U409~~

U410



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

June 20, 1996

REPLY TO THE ATTENTION OF:

DRP-8J

CERTIFIED MAIL: P371 896 606
RETURN RECEIPT REQUESTED

Fred G. Nicar, General Manager
Chemical Waste Management, Inc.
Vickery Facility
3956 State Route 412
Vickery, Ohio 43464

RE: Chemical Waste Management, Inc. - Vickery, Ohio
Federal Resource Conservation and Recovery Act
(RCRA) Permit Modifications
OHD 045 243 706

Dear Mr. Nicar:

The United States Environmental Protection Agency (U.S. EPA) has reviewed Chemical Waste Management, Inc.'s (CWM-Vickery) Class 2 Federal RCRA permit modification request submitted on February 2, 1996, two Class 1 Modification requests dated August 8, 1995 and January 13, 1995. The public comment period for the Class 2 Federal RCRA permit modification concluded on April 4, 1996, with no comments received.

The Class 2 Federal RCRA permit modification requested CWM-Vickery be allowed to continue to receive the carbamate waste codes, which were published in the February 9, 1995 Federal Register. The Class 1 permit modification dated August 8, 1995, requested the addition of the same carbamate waste codes. The final Class 1 permit modification also requested the U.S. EPA's approval for handling newly regulated waste codes F032, F034, and F035.

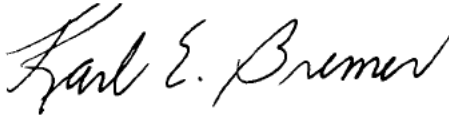
The U.S. EPA has approved CWM-Vickery's Class 2 Federal RCRA permit modification request, pursuant to Title 40 Code of Federal Regulations (40 CFR) Section 27.1. In addition, the U.S. EPA has approved CWM-Vickery's Class 1 Federal RCRA permit modification request to handle the carbamate waste codes approved under the above Class 2 modification. The U.S. EPA also approved CWM-Vickery's Class 1 permit modification allowing for the handling of waste codes F032, F034, and F035.

Enclosed is the revised portion of Federal RCRA permit, excluding the Attachments, which contains the modified language. Please replace the current page of the Federal RCRA permit, excluding the Attachments, with the enclosed modified page of the Federal RCRA permit. The Attachments to the original permit have not been modified and remain a part of this Federal RCRA permit.

In addition, please send a notice of these permit modifications to all persons on the facility mailing list and the appropriate units of State and local government, if you have not already done so.

If you have questions please contact Thomas Matheson, a member of my staff at (312) 886-7569.

Sincerely,



Karl E. Bremer, Chief
Waste Management Branch

Enclosure

cc: Ed Lim, OEPA w/enclosure
Chuck Hull, OEPA/NEDO w/enclosure

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
HAZARDOUS WASTE MANAGEMENT PERMIT

Name of Permittee: Chemical Waste Management, Inc.

Facility Location: Street Address: 3956 State Route 412

City, State: Vickery, Ohio 43469

EPA Identification Number: OHD 020 273 819

Effective Date: October 24, 1994

Expiration Date: Ten (10) years from effective date

Authorized Activities:

Pursuant to the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) of 1976, and the Hazardous and Solid Waste Amendments (HSWA) of 1984 (42 U.S.C. §6901, et seq.), and regulations promulgated thereunder by the United States Environmental Protection Agency (U.S. EPA) (codified in Title 40 of the Code of Federal Regulations (40 CFR)), Federal permit conditions (hereinafter called the permit) of the RCRA permit are issued to Chemical Waste Management, Inc. (hereinafter called the Permittee), for the Chemical Waste Management, Inc. facility, located in Vickery, Ohio.

The RCRA permit contains both the effective Federal permit conditions (contained herein) and the effective State permit conditions issued by the State of Ohio's RCRA program authorized under 40 CFR Part 271 (hereinafter called the State permit). When both this permit and the State permit are effective, the Permittee has an effective RCRA permit which authorizes the Permittee to conduct hazardous waste management activities as specified in the RCRA permit.

Permit Approval:

On June 30, 1989, the State of Ohio received final authorization pursuant to Section 3006 of RCRA, 42 U.S.C. §6926, and 40 CFR Part 271, to administer the pre-HSWA RCRA hazardous waste program. In addition, on June 7, 1991, the State of Ohio received final authorization for certain pre-HSWA RCRA regulations not included in the original authorization, as well as for certain HSWA authorities. As the State of Ohio has not yet received authorization to administer the entire hazardous waste program requirements of HSWA, additional permit conditions must be issued by the U.S. EPA to address these requirements. These additional conditions are contained in this permit.

The Permittee must comply with all terms and conditions of the Federal portion of the RCRA permit. This Federal portion of the RCRA permit contains both the effective Federal permit conditions that became effective on October 24, 1994, (including those in any attachments), the permit conditions contained in this modification, any previous modifications to the Federal portion of the RCRA permit, and the applicable regulations contained in 40 CFR Parts 260, 261, 262, 264, 266, 268, 270, and 124, and applicable provisions of HSWA.

This permit modification is based on the assumption that the information submitted in support of the permit modification is accurate. Any inaccuracies found in this information may be grounds for the termination, revocation and reissuance, or further modification of this permit (see 40 CFR 270.41, 270.42, and 270.43) and potential enforcement action. The Permittee must inform the U.S. EPA of any deviation from or changes in the information submitted in support of the modification as soon as the Permittee becomes aware of such deviation or changes.

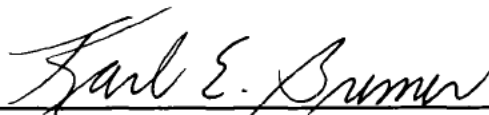
Opportunity to Appeal:

Petitions for review must be submitted within 30 days after service of notice of the final permit modification decision. Any person who filed comments on the draft permit modification, or participated in the public hearing may petition the Environmental Appeals Board to review any condition of the permit modification decision. Any person who failed to file comments or failed to participate in the public hearing on the draft permit modification may petition for administrative review only to the extent of the changes from the draft permit modification to the final permit modification decision. The procedures for permit appeals are found in 40 CFR 124.19.

Effective Date:

This permit is effective immediately upon issuance, unless a review is requested under 40 CFR 124.19, and shall remain in effect until October 24, 2004, unless revoked and reissued, or terminated (40 CFR 270.41, 270.43), or continued in accordance with 40 CFR 270.51.

BY: _____



Karl E. Bremer, Chief
Waste Management Branch
Waste, Pesticides and Toxics Division

DATE: _____

6/20/96

C. OTHER WASTE IDENTIFICATION

The Permittee may store, treat and dispose of the following wastes in containers, tanks, filtration unit and injection wells at the facility subject to the terms of the RCRA permit.

<u>Description of Hazardous Waste</u>	<u>EPA Hazardous Waste Number</u>	<u>Maximum Volume</u>	<u>Description of Unit(s)</u>
Solid and Liquid Waste	See List Below	678,920 gallons	Container Storage (S01)
Liquid Waste	See List Below	1,102,600 gallons	Tank Storage (S02)
Liquid Waste	See List Below	650,000 gallons/day	Treatment in Tanks (T01)
Liquid Waste	See List Below	650,000 gallons/day	Filtration (T04)
Liquid Waste	See List Below	2.4x10 ⁹ gallons	Injection Well Disposal (D79)

EPA Hazardous Wste Numbers: F032, F034, F035, K141, K142, K143, K144, K145, K146, K147, K148, K149, K150, K151, K156, K157, K158, K159, K160, K161, P127, P128, P185, P188, P189, P190, P191, P192, P194, P196, P197, P198, P199, P201, P203, P204, P205, U271, U277, U278, U279, U280, U364, U365, U366, U367, U372, U373, U375, U376, U377, U378, U379, U381, U382, U383, U384, U385, U386, U387, U389, U390, U391, U392, U393, U394, U395, U396, U400, U401, U402, U403, U404, U409, U410, U411.

D. CONDITIONS REGARDING UNITS

1. All units described in Condition IV.A. above shall be operated in accordance with the State permit conditions and the State Underground Injection Control Permit conditions pertaining to those units.
2. The Permittee shall follow the waste analysis procedures required in 40 CFR Part 264, and as described in the Waste Analysis plan found in Attachment III.

V. AIR EMISSION STANDARDS

A. PROCESS VENTS

The Permittee shall comply with all applicable requirements of 40 CFR Part 264, Subpart AA, regarding air emission standards for process vents.



Chemical Waste Management, Inc.

3956 State Rte. 412
Vickery, Ohio 43464
419/547-7700

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
P 741 310 730

August 1, 1990

United States Environmental Protection Agency
Region V
230 South Dearborn
Chicago, IL 60604

Attn: Karl E. Bremer, Chief
RCRA Permitting Branch

RE: Chemical Waste Management Vickery Ohio Facility Class 1 Permit
Modification (Addition of new Waste Codes to Part A Permit)
EPA #OHD020273819

Dear Mr. Bremer:

Attached please find Chemical Waste Management's revised Part A Permit Application for the Vickery, Ohio facility. This application has been revised to conform with the requirements of the Land Disposal Restriction recently promulgated in the Third-Third rule and the Toxicity Characteristic (TC) Rule promulgated March 29, 1990. This modification request constitutes a Class 1 permit modification under the provisions of 40 CFR 270.42(g).

In accordance with 40 CFR 270.42(g) please note the following:

1. This facility was in existence on March 29, 1990 and May 8, 1990;
2. On or about November 8, 1985, this facility certified compliance with Part 265 requirements.

In accordance with 40 CFR 270.42 (a)(i) we hereby notify the Director that the following waste codes are being added to Vickery's permit:

<u>CODE</u>	<u>IDENTIFICATION</u>
D018	Benzene
D019	Carbon tetrachloride
D020	Chlordane
D021	Chlorobenzene
D022	Chloroform
D023	o-Cresol
D024	m-Cresol
D025	p-Cresol
D026	Cresol

324-30

RECEIVED

AUG 7 1990

REGIONAL OFFICE
WASTE MANAGEMENT DIVISION
U.S. EPA, REGION V

Page 2
Mr. Bremer
August 1, 1990

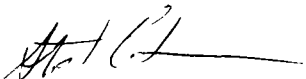
<u>CODE</u>	<u>IDENTIFICATION</u>
D027	1,4-Dichlorobenzene
D028	1,2-Dichloroethane
D029	1,1-Dichloroethylene
D030	2,4-Dinitrotoluene
D031	Heptachlor (and its hydroxide)
D032	Hexachlorobenzene
D033	Hexachloro-1,3-butadiene
D034	Hexachloroethane
D035	Methyl ethyl ketone
D036	Nitrobenzene
D037	Pentachlorophenol
D038	Pyridine
D039	Tetrachloroethylene
D040	Trichloroethylene
D041	2,4,5-Trichlorophenol
D042	2,4,6-Trichlorophenol
D043	Vinyl chloride
F039	Multi-source leachate

The addition of these waste codes to the permit does not reflect an intent to accept new types of waste streams. Other than the addition of these waste codes to our permit, no other change is being made to the permit and, consequently, no other information under 40 CFR 270 is being provided. The additions of these codes will in no manner affect public health or safety or the environment.

If you have any questions, please contact me at (419) 547-7791.

Sincerely yours,

CHEMICAL WASTE MANAGEMENT, INC.



Stephen C. Lonneman
Senior Environmental Engineer
Eastern Region

SCL/tr

cc w/attachment: Thomas Crepeau, OEPA
Chuck Hull, OEPA
Agency Correspondence File

cc w/o attachment: Fred Nicar
Bob Heitman

FORM 1 GENERAL	U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program (Read the "General Instructions" before starting.)	I. EPA I.D. NUMBER <div style="border: 1px solid black; padding: 2px;"> F O H D O 2 0 2 7 3 8 1 9 D </div>																																																						
II. POLLUTANT CHARACTERISTICS <p>INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.</p> <table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2">SPECIFIC QUESTIONS</th> <th colspan="3">MARK "X"</th> <th rowspan="2">SPECIFIC QUESTIONS</th> <th colspan="3">MARK "X"</th> </tr> <tr> <th>YES</th> <th>NO</th> <th>FORM ATTACHED</th> <th>YES</th> <th>NO</th> <th>FORM ATTACHED</th> </tr> </thead> <tbody> <tr> <td>A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)</td> <td></td> <td>X</td> <td></td> <td>B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)</td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)</td> <td>X</td> <td></td> <td></td> <td>D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)</td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)</td> <td>X</td> <td></td> <td></td> <td>F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)</td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)</td> <td></td> <td>X</td> <td></td> <td>H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)</td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)</td> <td></td> <td>X</td> <td></td> <td>J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)</td> <td></td> <td>X</td> <td></td> </tr> </tbody> </table>		SPECIFIC QUESTIONS	MARK "X"			SPECIFIC QUESTIONS	MARK "X"			YES	NO	FORM ATTACHED	YES	NO	FORM ATTACHED	A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. 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Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.
SPECIFIC QUESTIONS	MARK "X"			SPECIFIC QUESTIONS	MARK "X"																																																			
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III. NAME OF FACILITY									
1	SKIP	CHEMICAL WASTE MANAGEMENT INC VICKERY							
IV. FACILITY CONTACT									
A. NAME & TITLE (last, first, & title)						B. PHONE (area code & no.)			
2	NICAR, FREDERICK, GENERAL MGR					419	547	7791	
V. FACILITY MAILING ADDRESS									
A. STREET OR P.O. BOX									
3	3956 STATE ROUTE 412								
B. CITY OR TOWN						C. STATE		D. ZIP CODE	
4	VICKERY					OH	43464		
VI. FACILITY LOCATION									
A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER									
5	3956 STATE ROUTE 412								
B. COUNTY NAME					C. CITY OR TOWN				
SANDUSKY COUNTY					VICKERY				
D. STATE					E. ZIP CODE		F. COUNTY CODE (if known)		
OH					43464				

A. FIRST										B. SECOND									
7 4 9 5 3 (specify) Hazardous Waste Mgmt. Services										7 (specify)									
C. THIRD										D. FOURTH									
7 (specify)										7 (specify)									

V. OPERATOR INFORMATION

A. NAME															B. Is the name listed in Item VIII-A also the owner?				
8 CHEMICAL WASTE MANAGEMENT INC															<input type="checkbox"/> YES <input type="checkbox"/> NO				
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)															D. PHONE (area code & no.)				
F = FEDERAL					M = PUBLIC (other than federal or state)					P (specify)					7 0 8 2 1 8 1 5 0 0				
S = STATE					O = OTHER (specify)														
P = PRIVATE																			
E. STREET OR P.O. BOX																			
3 0 0 3 BUTTERFIELD ROAD																			
F. CITY OR TOWN										G. STATE		H. ZIP CODE		IX. INDIAN LAND					
B OAK BROOK										I L		6 0 5 2 1		Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO					

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)										D. PSD (Air Emissions from Proposed Sources)									
9 N 2 I N 0 0 0 1 6 * C D										9 P 0 3 7 2 0 0 1 0 5									
B. UIC (Underground Injection of Fluids)										E. OTHER (specify)									
9 U U I C 0 3 7 2 0 0 9										9 0 3 7 2 0 0 1 0 5 (specify) Boiler #1 & #2									
C. RCRA (Hazardous Wastes)										E. OTHER (specify)									
9 R 0 3 - 7 2 - 0 1 9 1										9 (specify) And UIC 0372011 Through UIC 0372013									

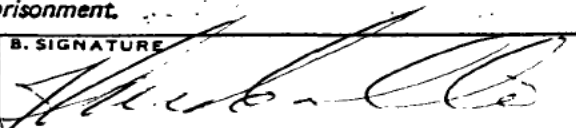
XI. MAP
 Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

The Vickery Facility receives only aqueous wastes for treatment and Deepwell disposal. Historically wastes were received in surface impoundments prior to filtration and Deepwell injection. This permit modification is made to allow the continued management of waste identified by newly created EPA hazardous waste numbers F039 and D018 through D043.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)		B. SIGNATURE		C. DATE SIGNED	
John Cirello Regional V.P. Eastern Region				2/25/90	

COMMENTS FOR OFFICIAL USE ONLY

C	
C	

CONTINUE ON REVERS

IV. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESSES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

DOES OR FOR DESCRIBING OTHER PROCESSES

code "T04"). FOR EACH PROCESS ENTERED HERE

S02 - Includes some existing, and replacement tanks (sand interceptors, V-4, V-5, V-6, V-7, T-1, T-2, T-3, T-4, T-5, T-6, all Fat Tanks, Lab Tank, and Sluice Tank)

T04a - Pug Mill (previously operated to stabilize impoundment materials).

T04 - Filtration (volume equal to that material treated in tanks)

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES: For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility. For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant. Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (If a code is not entered in D(1))
X-1	K054	900	P	T03D80	
X-2	D002	400	P	T03D80	
X-3	D001	100	P	T03D80	
X-4	D002				included with above

EPA I.D. NUMBER (enter from page 1)												FOR OFFICIAL USE ONLY											
W O H D O 2 0 2 7 3 8 1 9 1 1												W DUP 2 DUP											

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

JZ	A. EPA HAZARD. WASTENO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																								
							1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (If a code is not entered in D(1))																				
	22	23	24	25			26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50
1	D	0	0	1	89,000	T	S	0	4	T	0	2	D	7	9																
2	D	0	0	1	89,000	T	S	0	2	T	0	1	D	7	9																
3	D	0	0	2	89,000	T	S	0	4	T	0	2	D	7	9																
4	D	0	0	2	89,000	T	S	0	2	T	0	1	D	7	9																
5	D	0	0	3	89,000	T	S	0	4	T	0	2	D	7	9																
6	D	0	0	3	89,000	T	S	0	2	T	0	1	D	7	9																
7	D	0	0	4	89,000	T	S	0	4	T	0	2	D	7	9																
8	D	0	0	4	89,000	T	S	0	2	T	0	1	D	7	9																
9	D	0	0	5	89,000	T	S	0	4	T	0	2	D	7	9																
10	D	0	0	5	89,000	T	S	0	2	T	0	1	D	7	9																
11	D	0	0	6	89,000	T	S	0	4	T	0	2	D	7	9																
2	D	0	0	6	89,000	T	S	0	2	T	0	1	D	7	9																
13	D	0	0	7	89,000	T	S	0	4	T	0	2	D	7	9																
14	D	0	0	7	89,000	T	S	0	2	T	0	1	D	7	9																
15	D	0	0	8	89,000	T	S	0	4	T	0	2	D	7	9																
16	D	0	0	8	89,000	T	S	0	2	T	0	1	D	7	9																
17	D	0	0	9	89,000	T	S	0	4	T	0	2	D	7	9																
18	D	0	0	9	89,000	T	S	0	2	T	0	1	D	7	9																
19	D	0	1	0	89,000	T	S	0	4	T	0	2	D	7	9																
20	D	0	1	0	89,000	T	S	0	2	T	0	1	D	7	9																
21	D	0	1	1	89,000	T	S	0	4	T	0	2	D	7	9																
22	D	0	1	1	89,000	T	S	0	2	T	0	1	D	7	9																
23	D	0	1	3	89,000	T	S	0	4	T	0	2	D	7	9																
24	D	0	1	3	89,000	T	S	0	2	T	0	1	D	7	9																
	D	0	1	4	89,000	T	S	0	4	T	0	2	D	7	9																
26	D	0	1	4	89,000	T	S	0	2	T	0	1	D	7	9																

EPA I.D. NUMBER (enter from page 1)										FOR OFFICE USE ONLY										
W 0 H D 0 2 0 2 7 3 8 1 9										W DUP 2 DUP										
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																				
Z O J	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE				C. UNIT OF MEASURE (enter code)		D. PROCESSES									
											1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (If a code is not entered in D(1))					
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	
1	D	0	1	5						T		S	0	4	T	0	2	D	7	9
2	D	0	1	5						T		S	0	2	T	0	1	D	7	9
3	D	0	1	6						T		S	0	4	T	0	2	D	7	9
4	D	0	1	6						T		S	0	2	T	0	1	D	7	9
5	F	0	0	1						T		S	0	4	T	0	2	D	7	9
6	F	0	0	1						T		S	0	2	T	0	1	D	7	9
7	F	0	0	2						T		S	0	4	T	0	2	D	7	9
8	F	0	0	2						T		S	0	2	T	0	1	D	7	9
9	F	0	0	3						T		S	0	4	T	0	2	D	7	9
10	F	0	0	3						T		S	0	2	T	0	1	D	7	9
11	F	0	0	4						T		S	0	4	T	0	2	D	7	9
12	F	0	0	4						T		S	0	2	T	0	1	D	7	9
13	F	0	0	5						T		S	0	4	T	0	2	D	7	9
14	F	0	0	5						T		S	0	2	T	0	1	D	7	9
15	F	0	0	6						T		S	0	4	T	0	2	D	7	9
16	F	0	0	6						T		S	0	2	T	0	1	D	7	9
17	F	0	1	9						T		S	0	4	T	0	2	D	7	9
18	F	0	1	8						T		S	0	2	T	0	1	D	7	9
19	F	0	0	7						T		S	0	4	T	0	2	D	7	9
20	F	0	0	7						T		S	0	2	T	0	1	D	7	9
21	F	0	0	8						T		S	0	4	T	0	2	D	7	9
22	F	0	0	8						T		S	0	2	T	0	1	D	7	9
23	F	0	0	9						T		S	0	4	T	0	2	D	7	9
4	F	0	0	9						T		S	0	2	T	0	1	D	7	9
25	F	0	1	0						T		S	0	4	T	0	2	D	7	9
26	F	0	1	0						T		S	0	2	T	0	1	D	7	9

EPA I.D. NUMBER (enter from pl)												FOR OFFICIAL USE ONLY											
W O H D O 2 0 2 7 3 8 1 7 1												W D U P 2 D U P											

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

1. WASTE NO. (enter code)	A. EPA HAZARD. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEAS- URE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (If a code is not entered in D(1))
1	F 0 1 2	89,000	T	S 0 4 T 0 2 D 7 9	
2	F 0 1 2	89,000	T	S 0 2 T 0 1 D 7 9	
3	K 0 1 7	89,000	T	S 0 4 T 0 2 D 7 9	
4	K 0 1 7	89,000	T	S 0 2 T 0 1 D 7 9	
5	K 0 4 9	89,000	T	S 0 4 T 0 2 D 7 9	
6	K 0 4 9	89,000	T	S 0 2 T 0 1 D 7 9	
7	K 0 5 2	89,000	T	S 0 4 T 0 2 D 7 9	
8	K 0 5 2	89,000	T	S 0 2 T 0 1 D 7 9	
9	K 0 6 0	89,000	T	S 0 4 T 0 2 D 7 9	
10	K 0 6 0	89,000	T	S 0 2 T 0 1 D 7 9	
11	K 0 6 2	89,000	T	S 0 4 T 0 2 D 7 9	
2	K 0 6 2	89,000	T	S 0 2 T 0 1 D 7 9	
13	P 0 0 1	89,000	T	S 0 4 T 0 2 D 7 9	
14	P 0 0 1	89,000	T	S 0 2 T 0 1 D 7 9	
15	P 0 0 5	89,000	T	S 0 4 T 0 2 D 7 9	
16	P 0 0 5	89,000	T	S 0 2 T 0 1 D 7 9	
17	P 0 1 0	89,000	T	S 0 4 T 0 2 D 7 9	
18	P 0 1 0	89,000	T	S 0 2 T 0 1 D 7 9	
19	P 0 1 2	89,000	T	S 0 4 T 0 2 D 7 9	
20	P 0 1 2	89,000	T	S 0 2 T 0 1 D 7 9	
21	P 0 1 8	89,000	T	S 0 4 T 0 2 D 7 9	
22	P 0 1 8	89,000	T	S 0 2 T 0 1 D 7 9	
23	P 0 2 2	89,000	T	S 0 4 T 0 2 D 7 9	
24	P 0 2 2	89,000	T	S 0 2 T 0 1 D 7 9	
	P 0 3 0	89,000	T	S 0 4 T 0 2 D 7 9	
26	P 0 3 0	89,000	T	S 0 2 T 0 1 D 7 9	

EPA I.D. NUMBER (enter from pag													FOR OFFICE													IS ONLY												
W O H D 0 2 0 2 7 3 8 1 9													W DUP													2 DUP												
DESCRIPTION OF HAZARDOUS WASTES (continued)																																						
NO	A. EPA HAZARD. WASTE NO (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																																		
				1. PROCESS CODES (enter)																																		
				2. PROCESS DESCRIPTION (If a code is not entered in D(1))																																		
1	P 0 4 4	89,000	T	S 0 4	T 0 2	D 7 9																																
2	P 0 4 4	89,000	T	S 0 2	T 0 1	D 7 9																																
3	P 0 5 0	89,000	T	S 0 4	T 0 2	D 7 9																																
4	P 0 5 0	89,000	T	S 0 2	T 0 1	D 7 9																																
5	P 0 6 4	89,000	T	S 0 4	T 0 2	D 7 9																																
6	P 0 6 4	89,000	T	S 0 2	T 0 1	D 7 9																																
7	P 0 7 8	89,000	T	S 0 4	T 0 2	D 7 9																																
8	P 0 7 8	89,000	T	S 0 2	T 0 1	D 7 9																																
9	P 0 9 8	89,000	T	S 0 4	T 0 2	D 7 9																																
10	P 0 9 8	89,000	T	S 0 2	T 0 1	D 7 9																																
11	P 1 0 5	89,000	T	S 0 4	T 0 2	D 7 9																																
12	P 1 0 5	89,000	T	S 0 2	T 0 1	D 7 9																																
13	P 1 0 5	89,000	T	S 0 4	T 0 2	D 7 9																																
14	P 1 0 6	89,000	T	S 0 2	T 0 1	D 7 9																																
15	P 1 1 9	89,000	T	S 0 4	T 0 2	D 7 9																																
16	P 1 1 9	89,000	T	S 0 2	T 0 1	D 7 9																																
17	P 1 2 0	89,000	T	S 0 4	T 0 2	D 7 9																																
18	P 1 2 0	89,000	T	S 0 2	T 0 1	D 7 9																																
19	U 0 0 1	89,000	T	S 0 4	T 0 2	D 7 9																																
20	U 0 0 1	89,000	T	S 0 2	T 0 1	D 7 9																																
21	U 0 0 2	89,000	T	S 0 4	T 0 2	D 7 9																																
22	U 0 0 2	89,000	T	S 0 2	T 0 1	D 7 9																																
23	U 0 0 3	89,000	T	S 0 4	T 0 2	D 7 9																																
4	U 0 0 3	89,000	T	S 0 2	T 0 1	D 7 9																																
25	U 0 0 7	89,000	T	S 0 4	T 0 2	D 7 9																																
26	U 0 0 7	89,000	T	S 0 2	T 0 1	D 7 9																																

EPA I.D. NUMBER (enter from p										FOR OFFICE USE ONLY									
W 0 H D 0 2 0 2 7 3 8 1 9 1										W 2 DUP									

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

O Z	A. EPA HAZARD. WASTENO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEA- SURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	U 0 0 8	89,000	T	S 0 4 T 0 2 D 7 9	
2	U 0 0 8	89,000	T	S 0 2 T 0 1 D 7 9	
3	U 0 0 9	89,000	T	S 0 4 T 0 2 D 7 9	
4	U 0 0 9	89,000	T	S 0 2 T 0 1 D 7 9	
5	U 0 1 2	89,000	T	S 0 4 T 0 2 D 7 9	
6	U 0 1 2	89,000	T	S 0 2 T 0 1 D 7 9	
7	U 0 1 6	89,000	T	S 0 4 T 0 2 D 7 9	
8	U 0 1 6	89,000	T	S 0 2 T 0 1 D 7 9	
9	U 0 1 9	89,000	T	S 0 4 T 0 2 D 7 9	
10	U 0 1 9	89,000	T	S 0 2 T 0 1 D 7 9	
11	U 0 3 1	89,000	T	S 0 4 T 0 2 D 7 9	
12	U 0 3 1	89,000	T	S 0 2 T 0 1 D 7 9	
13	U 0 3 4	89,000	T	S 0 4 T 0 2 D 7 9	
14	U 0 3 4	89,000	T	S 0 2 T 0 1 D 7 9	
15	U 0 3 6	89,000	T	S 0 4 T 0 2 D 7 9	
16	U 0 3 6	89,000	T	S 0 2 T 0 1 D 7 9	
17	U 0 4 3	89,000	T	S 0 4 T 0 2 D 7 9	
18	U 0 4 3	89,000	T	S 0 2 T 0 1 D 7 9	
19	U 0 4 4	89,000	T	S 0 4 T 0 2 D 7 9	
20	U 0 4 4	89,000	T	S 0 2 T 0 1 D 7 9	
21	U 0 5 1	89,000	T	S 0 4 T 0 2 D 7 9	
22	U 0 5 1	89,000	T	S 0 2 T 0 1 D 7 9	
23	U 0 5 2	89,000	T	S 0 4 T 0 2 D 7 9	
24	U 0 5 2	89,000	T	S 0 2 T 0 1 D 7 9	
25	U 0 5 3	89,000	T	S 0 4 T 0 2 D 7 9	
26	U 0 5 3	89,000	T	S 0 2 T 0 1 D 7 9	

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY												
W 0 H D 0 2 0 2 7 3 8 1 9 1													W DUP 2 DUP												
DESCRIPTION OF HAZARDOUS WASTES (continued)																									
NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																					
				1. PROCESS CODES (enter)																					
				2. PROCESS DESCRIPTION (If a code is not entered in D(1))																					
1	U 0 5 5	89,000	T	S 0 4	T 0 2	D 7 9																			
2	U 0 5 5	89,000	T	S 0 2	T 0 1	D 7 9																			
3	U 0 5 6	89,000	T	S 0 4	T 0 2	D 7 9																			
4	U 0 5 6	89,000	T	S 0 2	T 0 1	D 7 9																			
5	U 0 5 7	89,000	T	S 0 4	T 0 2	D 7 9																			
6	U 0 5 7	89,000	T	S 0 2	T 0 1	D 7 9																			
7	U 0 6 8	89,000	T	S 0 4	T 0 2	D 7 9																			
8	U 0 6 8	89,000	T	S 0 2	T 0 1	D 7 9																			
9	U 0 7 0	89,000	T	S 0 4	T 0 2	D 7 9																			
10	U 0 7 0	89,000	T	S 0 2	T 0 1	D 7 9																			
11	U 0 7 2	89,000	T	S 0 4	T 0 2	D 7 9																			
12	U 0 7 2	89,000	T	S 0 2	T 0 1	D 7 9																			
13	U 0 7 5	89,000	T	S 0 4	T 0 2	D 7 9																			
14	U 0 7 5	89,000	T	S 0 2	T 0 1	D 7 9																			
15	U 0 7 7	89,000	T	S 0 4	T 0 2	D 7 9																			
16	U 0 7 7	89,000	T	S 0 2	T 0 1	D 7 9																			
17	U 0 7 8	89,000	T	S 0 4	T 0 2	D 7 9																			
18	U 0 7 8	89,000	T	S 0 2	T 0 1	D 7 9																			
19	U 0 8 0	89,000	T	S 0 4	T 0 2	D 7 9																			
20	U 0 8 0	89,000	T	S 0 2	T 0 1	D 7 9																			
21	U 0 8 1	89,000	T	S 0 4	T 0 2	D 7 9																			
22	U 0 8 1	89,000	T	S 0 2	T 0 1	D 7 9																			
23	U 0 8 8	89,000	T	S 0 4	T 0 2	D 7 9																			
24	U 0 8 8	89,000	T	S 0 2	T 0 1	D 7 9																			
25	U 0 9 2	89,000	T	S 0 4	T 0 2	D 7 9																			
26	U 0 9 2	89,000	T	S 0 2	T 0 1	D 7 9																			

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY															
W O H D 0 2 0 2 7 3 8 1													W DUP 2 DUP															
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																												
A. EPA HAZARD WASTENO (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE				C. UNIT OF MEASURE (enter code)				D. PROCESSES																
												1. PROCESS CODES (enter)																
												2. PROCESS DESCRIPTION (If a code is not entered in D(1))																
1	U	1	0	2	89,000	T	S	0	4	T	0	2	D	7	9													
2	U	1	0	2	89,000	T	S	0	2	T	0	1	D	7	9													
3	U	1	0	3	89,000	T	S	0	4	T	0	2	D	7	9													
4	U	1	0	3	89,000	T	S	0	2	T	0	1	D	7	9													
5	U	1	0	5	89,000	T	S	0	4	T	0	2	D	7	9													
6	U	1	0	5	89,000	T	S	0	2	T	0	1	D	7	9													
7	U	1	0	8	89,000	T	S	0	4	T	0	2	D	7	9													
8	U	1	0	8	89,000	T	S	0	2	T	0	1	D	7	9													
9	U	1	1	2	89,000	T	S	0	4	T	0	2	D	7	9													
10	U	1	1	2	89,000	T	S	0	2	T	0	1	D	7	9													
11	U	1	1	3	89,000	T	S	0	4	T	0	2	D	7	9													
12	U	1	1	3	89,000	T	S	0	2	T	0	1	D	7	9													
13	U	1	1	5	89,000	T	S	0	4	T	0	2	D	7	9													
14	U	1	1	5	89,000	T	S	0	2	T	0	1	D	7	9													
15	U	1	1	7	89,000	T	S	0	4	T	0	2	D	7	9													
16	U	1	1	7	89,000	T	S	0	2	T	0	1	D	7	9													
17	U	1	2	1	89,000	T	S	0	4	T	0	2	D	7	9													
18	U	1	2	1	89,000	T	S	0	2	T	0	1	D	7	9													
19	U	1	2	2	89,000	T	S	0	4	T	0	2	D	7	9													
20	U	1	2	2	89,000	T	S	0	2	T	0	1	D	7	9													
21	U	1	2	3	89,000	T	S	0	4	T	0	2	D	7	9													
22	U	1	2	3	89,000	T	S	0	2	T	0	1	D	7	9													
23	U	1	2	4	89,000	T	S	0	4	T	0	2	D	7	9													
24	U	1	2	4	89,000	T	S	0	2	T	0	1	D	7	9													
	U	1	2	5	89,000	T	S	0	4	T	0	2	D	7	9													
26	U	1	2	5	89,000	T	S	0	2	T	0	1	D	7	9													

EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY									
W O H D 0 2 0 2 7 3 8 1 9										W O H D 0 2 0 2 7 3 8 1 9									
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)										D. PROCESSES									
NO.	A. EPA HAZARD WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (If a code is not entered in D(1))								
	22	23	24	25			26	27	28	29	30	31	32	33					
1	U	1	3	1	89,000	T	S	0	4	T	0	2	D	7	9				
2	U	1	3	1	89,000	T	S	0	2	T	0	1	D	7	9				
3	U	1	3	3	89,000	T	S	0	4	T	0	2	D	7	9				
4	U	1	3	3	89,000	T	S	0	2	T	0	1	D	7	9				
5	U	1	3	4	89,000	T	S	0	4	T	0	2	D	7	9				
6	U	1	3	4	89,000	T	S	0	2	T	0	1	D	7	9				
7	U	1	3	5	89,000	T	S	0	4	T	0	2	D	7	9				
8	U	1	3	5	89,000	T	S	0	2	T	0	1	D	7	9				
9	U	1	4	0	89,000	T	S	0	4	T	0	2	D	7	9				
10	U	1	4	0	89,000	T	S	0	2	T	0	1	D	7	9				
11	U	1	4	4	89,000	T	S	0	4	T	0	2	D	7	9				
12	U	1	4	4	89,000	T	S	0	2	T	0	1	D	7	9				
13	U	1	4	7	89,000	T	S	0	4	T	0	2	D	7	9				
14	U	1	4	7	89,000	T	S	0	2	T	0	1	D	7	9				
15	U	1	4	8	89,000	T	S	0	4	T	0	2	D	7	9				
16	U	1	4	8	89,000	T	S	0	2	T	0	1	D	7	9				
17	U	1	5	1	89,000	T	S	0	4	T	0	2	D	7	9				
18	U	1	5	1	89,000	T	S	0	2	T	0	1	D	7	9				
19	U	1	5	4	89,000	T	S	0	4	T	0	2	D	7	9				
20	U	1	5	4	89,000	T	S	0	2	T	0	1	D	7	9				
21	U	1	5	9	89,000	T	S	0	4	T	0	2	D	7	9				
22	U	1	5	9	89,000	T	S	0	2	T	0	1	D	7	9				
23	U	1	6	1	89,000	T	S	0	4	T	0	2	D	7	9				
	U	1	6	1	89,000	T	S	0	2	T	0	1	D	7	9				
25	U	1	6	2	89,000	T	S	0	4	T	0	2	D	7	9				
26	U	1	6	2	89,000	T	S	0	2	T	0	1	D	7	9				

EPA I.D. NUMBER (enter from p. 1)												FOR OFFICIAL USE ONLY											
W O H D 0 2 0 2 7 3 8 1												W DUP 2 DUP											

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

1. HAZARDOUS WASTE NO. (enter code)	2. ESTIMATED ANNUAL QUANTITY OF WASTE	3. UNIT OF MEASURE (enter code)	D. PROCESSES			
			1. PROCESS CODES (enter)		2. PROCESS DESCRIPTION (If a code is not entered in D(1))	
1	U 1 6 5	89,000	T	S 0 4 T 0 2 D 7 9		
2	U 1 6 5	89,000	T	S 0 2 T 0 1 D 7 9		
3	U 1 6 7	89,000	T	S 0 4 T 0 2 D 7 9		
4	U 1 6 7	89,000	T	S 0 2 T 0 1 D 7 9		
5	U 1 6 9	89,000	T	S 0 4 T 0 2 D 7 9		
6	U 1 6 9	89,000	T	S 0 2 T 0 1 D 7 9		
7	U 1 8 2	89,000	T	S 0 4 T 0 2 D 7 9		
8	U 1 8 2	89,000	T	S 0 2 T 0 1 D 7 9		
9	U 1 8 8	89,000	T	S 0 4 T 0 2 D 7 9		
10	U 1 8 8	89,000	T	S 0 2 T 0 1 D 7 9		
11	U 1 9 0	89,000	T	S 0 4 T 0 2 D 7 9		
12	U 1 9 0	89,000	T	S 0 2 T 0 1 D 7 9		
13	U 1 9 6	89,000	T	S 0 4 T 0 2 D 7 9		
14	U 1 9 6	89,000	T	S 0 2 T 0 1 D 7 9		
15	U 2 0 1	89,000	T	S 0 4 T 0 2 D 7 9		
16	U 2 0 1	89,000	T	S 0 2 T 0 1 D 7 9		
17	U 2 0 7	89,000	T	S 0 4 T 0 2 D 7 9		
18	U 2 0 7	89,000	T	S 0 2 T 0 1 D 7 9		
19	U 2 0 8	89,000	T	S 0 4 T 0 2 D 7 9		
20	U 2 0 8	89,000	T	S 0 2 T 0 1 D 7 9		
21	U 2 1 0	89,000	T	S 0 4 T 0 2 D 7 9		
22	U 2 1 0	89,000	T	S 0 2 T 0 1 D 7 9		
23	U 2 1 1	89,000	T	S 0 4 T 0 2 D 7 9		
24	U 2 1 1	89,000	T	S 0 2 T 0 1 D 7 9		
25	U 2 1 3	89,000	T	S 0 4 T 0 2 D 7 9		
26	U 2 1 3	89,000	T	S 0 2 T 0 1 D 7 9		

EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY									
W 0 H D 0 2 0 2 7 3 8 1 9										W DUP 2 DUP									
DESCRIPTION OF HAZARDOUS WASTES (continued)										D. PROCESSES									
Z JZ	A. EPA HAZARD WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE				C. UNIT OF MEASURE (enter code)	1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (If a code is not entered in D(1))					
	12	13	14	15	16	17	18	19		20	21	22	23	24	25	26	27	28	
1	U	2	1	9					T	S	0	4	T	0	2	D	7	9	
2	U	2	1	9					T	S	0	2	T	0	1	D	7	9	
3	U	2	2	0					T	S	0	4	T	0	2	D	7	9	
4	U	2	2	0					T	S	0	2	T	0	1	D	7	9	
5	U	2	2	1					T	S	0	4	T	0	2	D	7	9	
6	U	2	2	1					T	S	0	2	T	0	1	D	7	9	
7	U	2	2	2					T	S	0	4	T	0	2	D	7	9	
8	U	2	2	2					T	S	0	2	T	0	1	D	7	9	
9	U	2	2	3					T	S	0	4	T	0	2	D	7	9	
10	U	2	2	3					T	S	0	2	T	0	1	D	7	9	
11	U	2	2	6					T	S	0	4	T	0	2	D	7	9	
12	U	2	2	6					T	S	0	2	T	0	1	D	7	9	
13	U	2	2	7					T	S	0	4	T	0	2	D	7	9	
14	U	2	2	7					T	S	0	2	T	0	1	D	7	9	
15	U	2	2	8					T	S	0	4	T	0	2	D	7	9	
16	U	2	2	8					T	S	0	2	T	0	1	D	7	9	
17	U	2	3	8					T	S	0	4	T	0	2	D	7	9	
18	U	2	3	8					T	S	0	2	T	0	1	D	7	9	
19	U	2	3	9					T	S	0	4	T	0	2	D	7	9	
20	U	2	3	9					T	S	0	2	T	0	1	D	7	9	
21	F	0	3	9					T	S	0	4	T	0	2	D	7	9	
22	F	0	3	9					T	S	0	2	T	0	1	D	7	9	
23	D	0	1	8					T	S	0	4	T	0	2	D	7	9	
	D	0	1	8					T	S	0	2	T	0	1	D	7	9	
25	D	0	1	9					T	S	0	4	T	0	2	D	7	9	
26	D	0	1	9					T	S	0	2	T	0	1	D	7	9	

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY			
W O H D 0 2 0 2 7 3 8 1 9 1													W DUP 2 DUP			
I. DESCRIPTION OF HAZARDOUS WASTES (continued)																
NO.	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES									
							1. PROCESS CODES (enter)						2. PROCESS DESCRIPTION (if a code is not entered in D(1))			
	21	22	23	24		25	26	27	28	29	30	31	32	33	34	35
1	D	0	2	0	89,000	T		S	0	4	T	0	2	D	7	9
2	D	0	2	0	89,000	T		S	0	2	T	0	1	D	7	9
3	D	0	2	1	89,000	T		S	0	4	T	0	2	D	7	9
4	D	0	2	1	89,000	T		S	0	2	T	0	1	D	7	9
5	D	0	2	2	89,000	T		S	0	4	T	0	2	D	7	9
6	D	0	2	2	89,000	T		S	0	2	T	0	1	D	7	9
7	D	0	2	3	89,000	T		S	0	4	T	0	2	D	7	9
8	D	0	2	3	89,000	T		S	0	2	T	0	1	D	7	9
9	D	0	2	4	89,000	T		S	0	4	T	0	2	D	7	9
10	D	0	2	4	89,000	T		S	0	2	T	0	1	D	7	9
11	D	0	2	5	89,000	T		S	0	4	T	0	2	D	7	9
12	D	0	2	5	89,000	T		S	0	2	T	0	1	D	7	9
13	D	0	2	6	89,000	T		S	0	4	T	0	2	D	7	9
14	D	0	2	6	89,000	T		S	0	2	T	0	1	D	7	9
15	D	0	2	7	89,000	T		S	0	4	T	0	2	D	7	9
16	D	0	2	7	89,000	T		S	0	2	T	0	1	D	7	9
17	D	0	2	8	89,000	T		S	0	4	T	0	2	D	7	9
18	D	0	2	8	89,000	T		S	0	2	T	0	1	D	7	9
19	D	0	2	9	89,000	T		S	0	4	T	0	2	D	7	9
20	D	0	2	9	89,000	T		S	0	2	T	0	1	D	7	9
21	D	0	3	0	89,000	T		S	0	4	T	0	2	D	7	9
22	D	0	3	0	89,000	T		S	0	2	T	0	1	D	7	9
23	D	0	3	1	89,000	T		S	0	4	T	0	2	D	7	9
24	D	0	3	1	89,000	T		S	0	2	T	0	1	D	7	9
--	D	0	3	2	89,000	T		S	0	4	T	0	2	D	7	9
26	D	0	3	2	89,000	T		S	0	2	T	0	1	D	7	9

EPA I.D. NUMBER (enter from page)										FOR OFFICIAL										ONLY									
W O H D 0 2 0 2 7 3 8 1 9										W										2 DUP									

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	D 0 3 3	89,000	T	S 0 4 T 0 2 D 7 9	
2	D 0 3 3	89,000	T	S 0 2 T 0 1 D 7 9	
3	D 0 3 4	89,000	T	S 0 4 T 0 2 D 7 9	
4	D 0 3 4	89,000	T	S 0 2 T 0 1 D 7 9	
5	D 0 3 5	89,000	T	S 0 4 T 0 2 D 7 9	
6	D 0 3 5	89,000	T	S 0 2 T 0 1 D 7 9	
7	D 0 3 6	89,000	T	S 0 4 T 0 2 D 7 9	
8	D 0 3 6	89,000	T	S 0 2 T 0 1 D 7 9	
9	D 0 3 7	89,000	T	S 0 4 T 0 2 D 7 9	
10	D 0 3 7	89,000	T	S 0 2 T 0 1 D 7 9	
11	D 0 3 8	89,000	T	S 0 4 T 0 2 D 7 9	
12	D 0 3 8	89,000	T	S 0 2 T 0 1 D 7 9	
13	D 0 3 9	89,000	T	S 0 4 T 0 2 D 7 9	
14	D 0 3 9	89,000	T	S 0 2 T 0 1 D 7 9	
15	D 0 4 0	89,000	T	S 0 4 T 0 2 D 7 9	
16	D 0 4 0	89,000	T	S 0 2 T 0 1 D 7 9	
17	D 0 4 1	89,000	T	S 0 4 T 0 2 D 7 9	
18	D 0 4 1	89,000	T	S 0 2 T 0 1 D 7 9	
19	D 0 4 2	89,000	T	S 0 4 T 0 2 D 7 9	
20	D 0 4 2	89,000	T	S 0 2 T 0 1 D 7 9	
21	D 0 4 3	89,000	T	S 0 4 T 0 2 D 7 9	
22	D 0 4 3	89,000	T	S 0 2 T 0 1 D 7 9	
23					
24					
25					
26					

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADD

NAL PROCESS CODES FROM ITEM D(1)

AGE 3.

EPA I.D. NO. (enter from page 1)												
5	4	3	2	1	0	9	8	7	6	5	4	3
F	O	H	D	0	2	0	2	7	3	8	1	9
1	2	3	4	5	6	7	8	9	10	11	12	13

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)						LONGITUDE (degrees, minutes, & seconds)								
4	1	2	2	1	9	N	0	8	2	5	8	4	0	W
45	46	47	48	49	50	51	72	73	74	75	76	77	78	79

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER						2. PHONE NO. (area code & no.)											
C	E	CWM Holdings, Inc.				7	0	8	-	2	1	8	-	1	5	0	0
12	13					33	34	35	36	37	38	39	40	41	42	43	
3. STREET OR P.O. BOX						4. CITY OR TOWN			5. ST.		6. ZIP CODE						
C	F	3003 Butterfield Road				C	G	Oak Brook			I	L	6				
12	13					45	46	47	48	49	50	51	52	53	54	55	

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)		B. SIGNATURE		C. DATE SIGNED	
Donald A. Wallgren V.P. CWM Holdings, Inc.				7-27-90	

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)		B. SIGNATURE		C. DATE SIGNED	
John Cirello Regional V.P. Eastern Region				7/23/90	

V. FACILITY DRAWING (see page 4)

A facultative drawing and topographic map of the site are included in Attachment I.



Chemical Waste Management, Inc

3956 State Rt 412
Vickery Ohio 43464
419 547-7791

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
P 741 310 745

October 15, 1990

Mr. Steve Bouchard
United States Environmental Protection Agency
Region V
230 South Dearborn
Chicago, IL 60604

RE: Chemical Waste Management Vickery Ohio Facility Part A Permit
Change

Dear Mr. Bouchard:

As you requested in our telephone discussion of October 11, 1990, I am submitting the attached pages to be added to our existing Part A. These pages include the newly created waste codes D018 through D043 and F039. As we discussed, the CWM Vickery submission of August 1, 1990 was incorrectly referenced to 40 CFR 270.42 instead of 40 CFR 270.72.

If you have any questions, please contact me at (419) 547-7791.

Sincerely yours,

CHEMICAL WASTE MANAGEMENT, INC.

Stephen C. Lonneman
Senior Environmental Engineer
Eastern Region

SCL/tr
Attachment

cc w/attachment: Thomas Crepeau, Ohio EPA
Chuck Hull, Ohio EPA
Agency Correspondence File

cc w/o attachment: Fred Nicar
Jay Skabo
Bob Heitman

RECEIVED
OCT 17 1990
OFFICE OF REGIONAL
WASTE MANAGEMENT
U.S. EPA

EPA ID NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY									
W 0 2 0 2 7 3 8 1 9 1 1										W 1 2 D U P									
DESCRIPTION OF HAZARDOUS WASTES (continued)																			
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES															
				1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (if a code is not entered in D(1))							
1	D 0 2 0	89,000	T	S 0 4	T 0 2	D 7 9													
2	D 0 2 0	89,000	T	S 0 2	T 0 1	D 7 9													
3	D 0 2 1	89,000	T	S 0 4	T 0 2	D 7 9													
4	D 0 2 1	89,000	T	S 0 2	T 0 1	D 7 9													
5	D 0 2 2	89,000	T	S 0 4	T 0 2	D 7 9													
6	D 0 2 2	89,000	T	S 0 2	T 0 1	D 7 9													
7	D 0 2 3	89,000	T	S 0 4	T 0 2	D 7 9													
8	D 0 2 3	89,000	T	S 0 2	T 0 1	D 7 9													
9	D 0 2 4	89,000	T	S 0 4	T 0 2	D 7 9													
10	D 0 2 4	89,000	T	S 0 2	T 0 1	D 7 9													
11	D 0 2 5	89,000	T	S 0 4	T 0 2	D 7 9													
	D 0 2 5	89,000	T	S 0 2	T 0 1	D 7 9													
13	D 0 2 6	89,000	T	S 0 4	T 0 2	D 7 9													
14	D 0 2 6	89,000	T	S 0 2	T 0 1	D 7 9													
15	D 0 2 7	89,000	T	S 0 4	T 0 2	D 7 9													
16	D 0 2 7	89,000	T	S 0 2	T 0 1	D 7 9													
17	D 0 2 8	89,000	T	S 0 4	T 0 2	D 7 9													
18	D 0 2 8	89,000	T	S 0 2	T 0 1	D 7 9													
19	D 0 2 9	89,000	T	S 0 4	T 0 2	D 7 9													
20	D 0 2 9	89,000	T	S 0 2	T 0 1	D 7 9													
21	D 0 3 0	89,000	T	S 0 4	T 0 2	D 7 9													
22	D 0 3 0	89,000	T	S 0 2	T 0 1	D 7 9													
23	D 0 3 1	89,000	T	S 0 4	T 0 2	D 7 9													
	D 0 3 1	89,000	T	S 0 2	T 0 1	D 7 9													
	D 0 3 2	89,000	T	S 0 4	T 0 2	D 7 9													
26	D 0 3 2	89,000	T	S 0 2	T 0 1	D 7 9													

NOTE: Photocopy this page before completion.

you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)															FOR OFFICIAL USE ONLY									
W O H D 0 2 0 2 7 3 8 1 9															W D U P									
DESCRIPTION OF HAZARDOUS WASTES (continued)															D. PROCESSES									
NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	1. PROCESS CODES (enter)										2. PROCESS DESCRIPTION (if a code is not entered in D(1))										
				27	28	27	28	27	28	27	28	27	28											
1	D 0 3 3	89,000		S	0	4	T	0	2	D	7	9												
2	D 0 3 3	89,000		S	0	2	T	0	1	D	7	9												
3	D 0 3 4	89,000		S	0	4	T	0	2	D	7	9												
4	D 0 3 4	89,000		S	0	2	T	0	1	D	7	9												
5	D 0 3 5	89,000		S	0	4	T	0	2	D	7	9												
6	D 0 3 5	89,000		S	0	2	T	0	1	D	7	9												
7	D 0 3 6	89,000		S	0	4	T	0	2	D	7	9												
8	D 0 3 6	89,000		S	0	2	T	0	1	D	7	9												
9	D 0 3 7	89,000		S	0	4	T	0	2	D	7	9												
10	D 0 3 7	89,000		S	0	2	T	0	1	D	7	9												
11	D 0 3 8	89,000		S	0	4	T	0	2	D	7	9												
12	D 0 3 8	89,000		S	0	2	T	0	1	D	7	9												
13	D 0 3 9	89,000		S	0	4	T	0	2	D	7	9												
14	D 0 3 9	89,000		S	0	2	T	0	1	D	7	9												
15	D 0 4 0	89,000		S	0	4	T	0	2	D	7	9												
16	D 0 4 0	89,000		S	0	2	T	0	1	D	7	9												
17	D 0 4 1	89,000		S	0	4	T	0	2	D	7	9												
18	D 0 4 1	89,000		S	0	2	T	0	1	D	7	9												
19	D 0 4 2	89,000		S	0	4	T	0	2	D	7	9												
20	D 0 4 2	89,000		S	0	2	T	0	1	D	7	9												
21	D 0 4 3	89,000		S	0	4	T	0	2	D	7	9												
22	D 0 4 3	89,000		S	0	2	T	0	1	D	7	9												
23	D 0 1 8	89,000		S	0	4	T	0	2	D	7	9												
24	D 0 1 8	89,000		S	0	2	T	0	1	D	7	9												
--	D 0 1 9	89,000		S	0	4	T	0	2	D	7	9												
26	D 0 1 9	89,000		S	0	2	T	0	1	D	7	9												

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY												
W O H D 0 2 0 2 7 3 8 1 9													W DUP												
IV DESCRIPTION OF HAZARDOUS WASTES (continued)																									
NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (if a code is not entered in D(1))													
				27	28	29	30	31	32	33	34	35	36	37	38	39	40								
1	F 0 3 9	89,000	T	S	0	4	T	0	2	D	7	9													
2	F 0 3 9	89,000	T	S	0	2	T	0	1	D	7	9													
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